

Field Test Measurements at Five Municipal Solid Waste Landfills with Landfill Gas Control Technology

Final Report



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Final Report

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Foreword

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This publication has been produced as part of the Laboratory's strategic long-term research plan. It is published and made available by EPA's Office of Research and Development to assist the user community and to link researchers with their clients.

Sally Gutierrez, Director
National Risk Management Research Laboratory

Notice

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1. Introduction

The purpose of this field test program is to generate data that may be used to update EPA's factors for quantifying landfill gas emissions from municipal solid waste (MSW) landfills. Because of health and environmental concerns, EPA issued in 1996 New Source Performance Standards (NSPS) and Emission Guidelines (EGs) for new and existing MSW landfills. These regulations are contained in 40 CFR Parts 51, 52, and 60, *Standards of Performance for New Stationary Sources and Guidelines for Control of Existing Sources: Municipal Solid Waste Landfills* (U.S. EPA, 1996, 1991a, 1991b, 1991c). These regulations require that large landfills collect and control landfill gas emissions.

Landfills are listed as a source for residual risk evaluation as part of EPA's Urban Air Toxic Strategy. Landfills are also subject to New Source Review under Title V of the Clean Air Act. The data being used for issuing air permits, developing estimates for emission inventories and environmental or risk assessments, are obtained from EPA's emission factors found in Chapter 2.4 of AP-42 (U.S. EPA, 1997). Factors for evaluating uncontrolled emissions and also combustion by-products are included in AP-42.

Much of the data used in developing the existing set of landfill gas emission factors in AP-42 were collected in support of the NSPS and EGs. Therefore much of this data is at least a decade old. Changes to the design and operation of MSW landfills have occurred that are suspected to influence MSW landfill air emissions. In addition, improvements in quality assurance (QA) and EPA test methods have occurred that enable better detection limits and higher quality data.

Through a Cooperative Research and Development Agreement (CRADA 01/02 CR1 26CFX81 80401F), the U.S. Environmental Protection Agency (EPA) formed a partnership with the Environmental Research and Education Foundation (EREF) to collect comprehensive and up-to-date data at U.S. MSW landfills. Field testing was conducted in two phases. The first phase helped finalize sampling and analytical methods used for the raw landfill gas and combustion by-product emissions. The second phase implemented the agreed upon methods using Category II QA project plan that included on-site auditing of field tests. The field testing began in November 2002 and was completed in June 2005. EPA's Office of Research and Development (ORD) worked in cooperation with industry partners and EPA's Office of Air Quality Planning and Standards (OAQPS) in establishing scope, field sampling and analytical protocols, and site selection. The field testing was conducted by ARCADIS G&M, Inc.

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(ARCADIS), as contractor to the EPA National Risk Management Research laboratory (NRMRL) Air Pollution Prevention and Control Division (APPCD), under several work assignments as part of the Onsite Laboratory Support Contracts (68-C-99-201 and EP-C-04-023).

Testing has been conducted in parallel to this field test program and is providing data that evaluates potential fugitive emissions from landfills. Data has also been collected to help quantify the emission differences between sites with and without leachate recirculation (EPA-600/R-05/072). In addition, guidance has been developed for evaluating the air pathway from older landfills (EPA-600/R-05/123a). The data from this effort, field studies, and data collected from industry and state and local regulatory agencies will be used in updating AP-42. Once updated factors are available, EPA's Landfill Gas Emission Model (LandGEM) will be updated to reflect the newer information (EPA-600/R-05/047). The revised emission factors for estimating uncontrolled emissions and combustion by-products will be provided in a new release of AP-42 including an updated background information document.

The site selection criteria for identifying potential sites for this study included: (1) no enforcement actions associated with the site; (2) the site must be in compliance with applicable EPA regulations (Clean Air Act and Resource Conservation Recovery Act); (3) the site must have state-of-the-art combustion technology in place for landfill gas control; and (4) the combustion technology must be representative of what is typical at U.S. landfills. Because of the potential benefit from utilization of landfill methane, EPA promotes landfill gas-to-energy projects through its Landfill Methane Outreach Program (LMOP). (www.epa.gov/lmop) Updated statistics from LMOP indicate that there are more than 400 landfill gas-to-energy projects in the U.S. (U.S. EPA, 2007). There is also information providing distribution of energy recovery projects in the U.S. (Thorneloe et al., 2000) This information was used in selecting the type and number of combustion technologies to include in this study. Ideally it would be nice to include a wider range of technologies but available funding limited the number to five facilities. The technologies that were included in this evaluation were two enclosed flares, two internal combustion (IC) engines, and one direct gas-fed boiler.

Sites that use leachate recirculation to accelerate waste decomposition were excluded as potential candidate sites. It may be important in future studies to explore how leachate recirculation may affect landfill gas emissions. However, this study did not include sites that use leachate recirculation or other liquid additions to accelerate waste decomposition.

1.1 Objective/Purpose and Intended Use of Project Results

The objective of this project was to collect and provide current data from U.S. MSW landfills with state-of-the-art control technology used for reducing landfill gas (LFG) emissions. Comprehensive testing was conducted of the raw landfill gas and the combustion outlet exhaust. The data will be used to help develop emission factors for use in updating EPA's AP-42 for estimating uncontrolled emissions from MSW landfills and combustion by-product emissions. Pollutants of concern include methane (CH₄), volatile organic compounds (VOCs), persistent bioaccumulative toxics (PBTs) such as mercury (Hg), and hazardous air pollutants (HAPs) such as benzene, vinyl chloride, and methyl ethyl ketone. The data will also be used to supplement AP-42 and to provide QA to data previously supplied by industry and others as part of the AP-42 update.

1.2 Scope of Project

The first phase of the project included two sites in the Northeast (Landfills A and B). Input for Phase I was obtained from EREF and EPA's Office of Air Quality Planning and Standards to identify appropriate sampling and analytical protocols and QA. Input was also obtained to identify pollutants of concern for the raw landfill gas (collected from the header pipe but upstream of gas pretreatment or condensate knockout) and combustion by-product emissions. Prior to initiating Phase 2, a review was conducted to determine changes needed to sampling and analytical protocol and QA. These changes in sampling, analytical protocol and QA are listed in section 3.5. The second phase included three sites located in the mid-west (Landfills C, D and E). Phase 1 testing took place from November 1 through November 5, 2002. Phase 2 testing took place from May 12 to May 16, 2004 for Landfills C and D, and from June 22 to June 23, 2005 at Landfill E.

The pollutants of interest for the raw (untreated) landfill gas included VOCs, non-methane organic compounds (NMOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), hydrogen sulfide (H₂S), carbonyls (acetaldehyde, formaldehyde), and Hg (total, elemental, and organo).

The pollutants of interest for combustion outlet exhaust included carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), NMOCs as total hydrocarbons (THCs), hydrogen chloride (HCl), total Hg, polychlorinated dibenzodioxins (PCDDs), polychlorinated dibenzofurans (PCDFs), polycyclic aromatics hydrocarbons (PAHs), and toxic heavy metals.

1.3 QA Considerations

This test program was conducted to meet Category II QA requirements. A generic QA program plan (QAPP) was prepared for the field test project. In addition, a site-specific QAPP was prepared for each field test.

This project set out to produce data that qualified to receive the "A" rating with respect to the rating system described in Section 4.4.2 of the *Procedures for Preparing Emission Factor Documents* (EPA-454/R-95-015). The cited EPA document provides a clear description of the requirements for an "A" data quality rating:

"Tests are performed by using an EPA reference test method, or when not applicable, a sound methodology. Tests are reported in enough detail for adequate validation and raw data are provided that can be used to duplicate the emission results presented in the report."

The Data Quality Objectives (DQOs) were specified in the Generic and Site-Specific QAPPs. The extent to which this program achieved the DQOs was reported in detail in each of the landfill test reports. Overall the DQOs were met except for a few limited cases such as dimethyl mercury for landfills A and B. In addition there were issues with PAH analysis which is discussed in more detail in this report. The issues that were identified in Phase 1 were addressed in Phase 2 so that the DQOs were met as explained in the individual reports. The list of changes made between Phases 1 and 2 is provided in Section 3.5 of this report.

As part of the QA process, an EPA QA representative conducted a Technical Systems Audit (TSA) of the sampling operations during the Landfill C tests. The Audit Report indicated that the sampling operations were in compliance with standard operating procedures (SOPs) and methods.

The following two sections discuss the two groups of measurements that did not produce the results as planned. All other measurements were conducted and produced results as originally planned.

1.3.1 PCDD/PCDF/PCB/PAH Measurements

Method 23 was used to evaluate the concentrations of PAHs and PCBs in the raw LFG for the two sites included in Phase 1 (Landfills A and B).

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In order to achieve the desired low detection limits typically required of these target analytes, the samples had to be greatly concentrated. The process of concentrating the sample extracts produced recovery extracts that were extremely concentrated in some other (not PAHs or PCBs) organic constituents. Those concentrations were sufficiently high to cause instrumental interferences and prevented the extracts from being analyzed to give the required low detection limits of the PAHs and PCBs target analytes. Injection of these organic-rich extracts would have over-ranged and corrupted the analytical instruments, necessitating major instrument repair and cleaning.

In fact, commercial laboratories even declined to attempt to analyze these extracts. The alternative of not concentrating the samples to avoid instrument over-ranging is possible but would produce PAHs and PCBs method detection limits so high as to render the measurements not meaningful. Therefore, during subsequent tests for Landfills C, D and E, these samples were not included in the target list. However, PAHs were analyzed in the combustion outlet exhaust.

1.3.2 Mercury Measurements

Landfills have been found to contain organo-mercury (Lindberg et al, 2005). Because the available organo-mercury measurement and analysis methods are not established EPA standard test methods, questions were raised about their application to landfill gas given the range of constituents of potential interferences. Phase 1 conducted a review of the protocol of these organo-mercury analysis methods and included QA checks to help in the evaluation of the methods. For both Phase 1 sites (Landfills A and B), unsatisfactory spike recoveries were obtained. ARCADIS in working with Frontier Geosciences, the subcontractor laboratory, determined that reducing the sample volume could result in more satisfactory spike recoveries. To help in improving information on the precision of the protocol for organo-mercury, a second analytical laboratory was contracted to compare results for one of the five landfills (i.e., Landfill E). These results were reported in the Landfill E report.

During the course of the test program, after Phase 1 (Landfills A and B) was completed, a review of mercury sampling and analysis was conducted including an audit of Frontier Geosciences laboratory's mercury analysis operations. This resulted in improving the procedures that were used in Phase 2. The conclusion is that organo-mercury sampling and analysis can provide useful results and that refinements in the protocols will improve the methods' applicability, accuracy, and precision.

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Lindberg et al, 2005 reported mercury measurement results from a total of nine landfills. The methodology for sampling and analysis of total, di-methyl, and mono-methyl used in these tests were very similar to the methodologies used at the five landfills included in this report, although sample volumes were slightly different. The range of total mercury in the Lindbergh report is from 10 to 11,500 ng/m³ while the range of total mercury in this report is from 158 to 1330 ng/m³. Overall the concentration of total Hg in the Lindbergh paper is much higher (as much as an order of magnitude in some cases) than the total mercury concentrations included in this report. The range of dimethyl mercury in the Lindbergh paper is from 4.5 to 99.8 ng/m³ while the range of dimethyl mercury in this report is from 6.5 to 77 ng/m³. Overall the concentrations of dimethyl mercury reported in this report and the Lindberg paper are similar. The range of monomethyl mercury in the Lindbergh paper is from ND to 39 ng/m³ while the range of monomethyl mercury in this report is from ND to 8.2 ng/m³. Overall the concentration of monomethyl mercury in the Lindbergh paper is higher than the monomethyl mercury concentrations included in this report.

Prestbo et al. (2003) determined total and dimethyl mercury concentrations in raw LFG and found that dimethyl mercury comprised from 1 to 60 percent of the total mercury in the LFG. Vasuki et al. (2003) measured total and dimethyl mercury concentrations in Delaware LFGD and found that dimethyl mercury comprised about 8 percent of the total LFG mercury. The percent mercury of the Vasuki et al (2003) paper is very comparable with the data reported here for the five landfills tested, however, the percent dimethyl mercury reported by Prestbo et al. (2003) appears to be very high by as much as an order of magnitude. The discrepancy in the percent of dimethyl mercury in LFG will be addressed in a follow-on study.

During the course of the test program, after Phase 1 (Landfills A and B) was completed, ARCADIS' QA staff conducted an in-depth review of the mercury measurement methodologies by conducting an audit of Frontier Geosciences laboratory's mercury analysis operations. The results of that audit were included as a part of the Phase 2 (Landfills C and D) test reports. The findings were that the mercury measurement methods were capable of producing useable results, while the methods were undergoing continuing refinements. Progress has been made steadily to improve the methods' applicability, accuracy, and precision.

2. Landfill Descriptions

The five landfills included in this evaluation were MSW landfills with gas collection and control technology. Two are located in the northeast and three were located in the mid-west. All five are still operational (i.e., accepting waste). Characteristics of these landfills are listed in Table 2-1.

Table 2-1. General Description of Tested Landfills

	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
Year that Waste Acceptance Began	1972	1967	1992	1991	1971
Area/Waste Footprint (acres)	56	40	63	31	240
Amount of waste (tons)	2,700,000 in 2003	4,000,000 in 2003	6,400,000 in 2004	2,350,000 in 2004	14,500,000 in 2005
Amount of waste (cubic yards)	---	---	1,580,000 in 2003	421,639	---
Facility estimated LFG extraction rate (standard cubic feet per minute) ^a	1700	1500	600	400	4800
Combustion Control Technology	Internal Combustion Engine	Flare	Internal Combustion Engine	Flare	Boiler
Field Test Dates	11/1/2002 to 11/2/2002	11/4/2002 to 11/5/2002	5/12/2004 to 5/13/2004	5/15/2004 to 5/16/2004	6/22/2005 to 6/23/2005

^a Extraction rate is what was collected, NOT production rate, and it is estimated

2.1 Characteristics of Landfills Selected for Field Tests

2.1.1 Landfill A

Landfill A is located in the Northeast and it began operation in 1972. Available information provided by the landfill site operator indicated that the site had 2,700,000 tons of waste in place in 2003, over an area of 56 acres. The landfill used 3,375 feet of horizontal collectors to collect the LFG. As of 2002, 29 vertical wells were in place to extract landfill gas. The collected gas was piped to two reciprocating internal combustion (RIC) engines. Any excess gas was flared. At this site, one of the two RIC engines was selected for field testing. The engine tested was selected arbitrarily.

2.1.2 Landfill B

Landfill B was located in the Northeast and began operation in 1967. Based on information provided by the facility operator, the site had 4,000,000 tons of waste in place, over an area of 40 acres in 2003. Approximately 2,500 feet of horizontal collectors were used to collect landfill gas. Operators stated that 49 vertical wells were used to extract landfill gas which is piped to an enclosed flare system.

2.1.3 Landfill C

Landfill C is located in the Midwest and began operation in 1992. Based on information provided by the site operator, Landfill C has approximately 6,400,000 tons of waste in place as of August 2004. Landfill gas is extracted using 54 vertical wells at a rate of 600 standard cubic feet per minute (scfm). The gas was piped to two Caterpillar 3560 engines. Excess gas was combusted in an enclosed flare.

2.1.4 Landfill D

Landfill D is located in the Midwest and began operation in 1991. Based on information provided by the site operator, Landfill D has approximately 2,350,000 tons of waste in place as of August 2004. The waste footprint covers an area of 31 acres. Landfill gas is extracted using 21 vertical wells at a rate of 400 cubic feet per minute. Extracted gas is piped to an enclosed flare.

2.1.5 Landfill E

Landfill E is located in the Midwest and began operation in 1971. As of June 2005, the landfill has 14,500,000 tons of waste in place covering an area of 240 acres. The LFG was extracted with 320 vertical wells and filtered, de-watered, compressed, and piped to the end users. The flow rate of the landfill gas was 4,800 scfm. This site had a number of innovative uses of landfill gas including producing steam for greenhouses, providing fuel for a large industrial boiler (replacing fuel oil), providing fuel for an asphalt plant, and the residual gas was flared. Demand and seasonal factors largely determined the use pattern and the maximum and minimum usage rates.

2.2 Description and Characteristics of Combustion Technology

2.2.1 Enclosed-Ground Flare (Landfills B and D)

2.2.1.1 Landfill B

A Perennial Energy Enclosed Ground Flare Station, rated at a maximum LFG input rate of 1500 scfm, was used to combust landfill gas at landfill B. A burner array and an automatic louver system were designed to control gas and combustion air distribution. Manufacturer information indicated that the flare was designed to obtain a minimum residence time of 0.6 seconds at 1400 °F. The station included a condensate removal device to prevent liquids from contacting the flare burners. The system also included a flame arrestor to prevent flame propagation into the LFG header pipe and collection system. The unit was reported to be able to operate within a 5-to-1 turndown ratio [54.0 to 10.8 million British Thermal Units per hr (MMBtu/hr)]. The manufacturer also reported minimal production of NO_x and effective destruction of hydrocarbons.

2.2.1.2 Landfill D

The enclosed ground flare evaluated at Landfill D was a John Zink Model 72 rated at a maximum LFG input rate of 695 scfm. A condensate removal system prevented liquids from contacting the flare burners. A flame arrestor prevented flame from propagating from the burner array back into the LFG header pipe and collection system. A burner array and an automatic louver system controlled gas and air distribution to achieve effective combustion. The manufacturer claimed that the unit could be operated satisfactorily within a 5-to-1 turndown ratio (from 20.9 to 4.0 MMBtu/hr). The system was designed for a minimum residence time of 0.7 seconds at 1800 °F to combust hydrocarbons with minimal production of NO_x.

2.2.2 IC Engine (Landfills A and C)

2.2.2.1 Landfill A

Landfill A utilized a bank of four Caterpillar (CAT) generator sets for destruction of LFG and generation of electricity. The engines were CAT 3412 four-stroke IC engines, adapted for landfill gas. The CAT 3412 was a spark-ignited (SI) V-12 engine with displacement of 1649 cubic inches. The engine was turbocharged and after-cooled, and had a cylinder bore diameter of 5.4 inches and a stroke of 6.0 inches. Engine #2

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was randomly selected and was tested. The engine was connected to a Caterpillar SR4 Generator that was rated at 470 KW.

2.2.2.2 Landfill C

Landfill C utilized a bank of two Caterpillar generator-sets for destruction of LFG and generation of electricity. The engines were CAT 3516 four-stroke engines, adapted for LFG fuel. The CAT 3516 was a spark-ignition (SI) V-16 engine with 4210 cubic inches displacement. The engine was turbocharged and after-cooled, and had a 6.7-inch diameter cylinder bore and a 7.5-inch stroke. The engine drove a Caterpillar SR4 Generator that was rated at 800KW (at a 0.8 power factor). Engine #1 was randomly selected and tested. The engine did not have pollution control equipment installed.

2.2.3 Boiler (Landfill E)

2.2.3.1 Landfill E

The tested boiler was a Combustion Engineering Model 33-7KT-10, A-Type Package Boiler, rated at 80,000 pounds-per-hour of 250 psi steam. The boiler was fueled by the collected LFG and produced base-load steam for an industrial facility. The boiler was located on the industrial facility's property, located approximately three miles from Landfill E.

3. Test Operations

The testing operations were conducted during spring through late fall (May through early November), when ambient air temperatures were above freezing.

Sample collection and other testing operations typically required seven- to eight-person sampling teams working for two full days. Prior to the sampling crew arriving at the landfills, the host facility operator was asked to install the necessary sampling ports, if these were not already present. In the case of Landfills C and D, excavation of soil was needed to expose the underground raw LFG pipes.

Other than these modifications to allow sampling equipment access, facility modification was not required or observed to have happened immediately prior to these tests.

3.1 Sample Locations

Two kinds of samples were collected - the raw LFG and the exhaust gas from the combustion-based emission control systems.

The raw LFG samples were collected from the LFG header pipe that connects the landfill's network of collection pipes and wells. The sample ports were upstream of the condensate removal unit, blower/compressor, and flow control or distribution equipment. Hence, the collected samples are representative of the raw LFG in its "natural" state.

During Phase 1 testing at Landfill A, a sample of condensate was collected from the LFG pipe leading to the engines. That location was downstream of the condensate removal unit and the condensate sample was not specified in the QAPPs. The sample was judged to be extraneous to the test program and had unclear value. Analysis of that sample was not useful without corresponding analysis of a vapor phase sample collected at the same location. Therefore, that condensate sample was not analyzed and similar samples were not collected during subsequent landfill tests.

For the tested engines and boiler, the exhaust gas samples were collected at their stack as these control devices had distinct stack pipes. The tested enclosed flares did not have distinct stacks as the whole flare unit served as the combustion unit and the stack. For all tests, the sample locations were selected to allow for isokinetic sampling.

3.2 Target Analytes

Through consultation between the CRADA partners and EPA's Office of Air Quality Planning and Standards (OAQPS) and Landfill Methane Outreach Program (LMOP) in the planning phase of the project, target analytes were selected. The list of analytes in the raw landfill gas and combustion outlet was much more comprehensive than that typical for performance tests of LFG control technology.

For organo-mercury compounds, standard EPA test methods were not available. Methods that were developed through Frontier Associates were used. Using these non-promulgated procedures required more effort in terms of quality assurance. Measuring the range of constituents in LFG gas can be quite challenging when compared to measuring other emission sources where there are fewer constituents to analyze.

3.2.1 Raw Landfill Gas

Table 3-1 lists the target analytes for the raw LFG samples that were collected at the gas header pipe. The list of target analytes for the raw LFG matched closely with the constituents listed in AP-42 emission factors for landfills. In addition to these analytes, the test included the "non-AP-42" compounds: carbonyls (formaldehyde and acetaldehyde), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), speciated mercury (monomethyl, dimethyl, elemental, and total). These constituents were of interest because of their status of being on the EPA list of HAPs.

Experience gained during Phase 1 testing revealed that the extracts of the PAH/PCB samples contained excessive amounts of non-PAH organics. In order to make the extracts safe to be injected into the gas chromatograph/mass spectrometer (GC/MS), samples had to be diluted excessively. The high dilution made the method detection levels for the target PAHs too high, resulting in "non-detects" at the high detection limits. The planned analysis method could not produce the desired results at the needed detection levels. Therefore, these measurements were not included in Phase 2 testing.

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Table 3-1. Target Analytes for the Raw Landfill Gas Samples collected at the Gas Header

Target Analytes in AP-42 List of Landfill Gas Constituents		
Methane	Acrylonitrile	t-1,2-Dichloroethene
Ethane	Benzene	Tetrachloroethene
Propane	Bromodichloromethane	Toluene
Butane	Carbon disulfide	Trichloroethylene
Pentane	Carbon tetrachloride	Vinyl chloride
Hexane	Chlorobenzene	Vinylidene chloride
Carbonyl sulfide	Chloroform	Ethanol
Chlorodifluoromethane	Dimethyl sulfide	Methyl ethyl ketone
Chloromethane	Ethyl mercaptan	2-Propanol
Dichlorodifluoromethane	Ethylene dibromide	1,4-Dichlorobenzene
Dichlorofluoromethane	Ethylene dichloride	Ethylbenzene
Ethyl chloride	Methyl chloroform	Xylenes
Fluorotrichloromethane	Methyl isobutyl ketone	
1,3-Butadiene	Methyl mercaptan	Non-methane organic compounds
Acetone	Methylene chloride	Hydrogen sulfide
Acetone	Propylene dichloride	

Target Analytes Not Previously Included in AP-42		
Acetaldehyde	Mercury	Gases
Formaldehyde	Organo-mercury compounds	Carbon dioxide
Polycyclic aromatic hydrocarbon ^a	Elemental	Oxygen
Polychlorinated biphenyls ^a	Total	Moisture

^a These target analytes were part of Phase 1 testing. They were not included in Phase 2 testing because of difficulties experienced by the analytical laboratory to analyze the overly organic-rich sample extracts.

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The other analytes, oxygen (O₂), carbon dioxide (CO₂), and moisture, are not pollutants but are of interest as they are useful indicators of the “quality” of the raw LFG. The concentrations of nitrogen (N₂) and O₂ are also indicators of the extent of ambient air infiltration into the LFG collection. Method 25C [for non-methane organic compound (NMOC) determination] specifically recommends that these measurements be made to determine the extent of potential air infiltration. Therefore, while measurements for methane (CH₄), CO₂, O₂, and N₂ by Method 3C were not included in the original QAPPs, these measurements were included and performed for all five landfill tests.

There was original interest in determining the concentration of the toxic heavy metals lead (Pb), arsenic (As), cadmium (Cd), chromium (Cr), manganese (Mn), and nickel (Ni) in the raw LFG. However, a method suitable for sampling the organics-rich raw LFG and capable of detecting the suspected low concentrations of the toxic metals, does not exist. Therefore measurement of the toxic heavy metals was not planned for the raw LFG.

3.2.2 Control Technology Exit

Table 3-2 lists the target analytes for the control technology exit gas samples. The focus of these analyses was to produce data that allowed for the assessment of the efficacies of the three tested control technologies to destroy the constituents in the raw LFG. They included O₂, CO₂, carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), total hydrocarbons (THCs), hydrogen chloride (HCl), dioxins/furans, PAHs, and the metals Pb, As, Cd, Cr, Mn, Ni and Hg.

Among the specified analytes, NMOC is the only one specified on the AP-42 list. The VOCs analyzed individually for the raw LFG were not individually targeted for the control technology exhaust gases because of the expected very low concentrations there. This assumption turned out to be not true for IC engines.

The gases O₂ and CO₂ were common combustion performance control parameters. CO, NO_x and SO₂ are criteria pollutants, the formation of which is generally associated with combustion processes.

Table 3-2. Target Analytes for the Control Technology Exit Gas

Target Analytes in AP-42 List of Landfill Gas Constituents		
NMOCs		
Target Analytes Not Previously Included in AP-42		
Gases:		Metals:
O ₂	HCl	Pb, As, Cd, Cr, Mn, Ni
CO ₂		Hg (total)
CO	PCDD/PCDF	
NO _x		
SO ₂	PAHs	

The emission reduction performance of hydrocarbons is determined using either Method 25C or 25A. If the NMOC concentration is less than 50 ppm, then Method 25A is recommended for use.

The remaining target analytes include HCl, PCDDs/PCDFs, PAHs, total Hg, and toxic heavy metals (Pb, As, Cd, Cr, Mn, Ni). These analytes are also identified in EPA's list of HAPs.

3.3 Sampling and Analysis Methods

3.3.1 Raw Landfill Gas Sampling Analysis Methods

Table 3-3 lists the sampling, analysis and measurement methods that were followed at the raw LFG header pipe location. The table also included the name of the organizations that performed the procedures. With the exception of the organic mercury methods for mercury analysis, ARCADIS staff performed the field collection of samples and associated data collection. Where multiple organizations are listed, the

Table 3-3. Testing Methods for Raw LFG

Procedure	Description	Organization Performing Analysis
EPA Method 1	Selection of traverse points	ARCADIS G&M
EPA Method 2	Determination of gas velocity and volumetric flow rate	ARCADIS G&M
EPA Method 3C	Determination of CO ₂ , CH ₄ , nitrogen (N ₂), and O ₂ in raw LFG	Triangle Environmental Services
EPA Method 11	Determination of H ₂ S	Oxford Laboratories (Landfills A, B, C, D) Enthalpy Analytical (Landfill E)
EPA Method 23	Determination of: PCDDs/PCDFs by Method 8290, PAHs by Method 8270 PCBs by Method 1668	ALTA Analytical Perspectives
EPA Method 25C	Determination of raw LFG NMOCs	Triangle Environmental Services
EPA Method 40/TO-15	Determination of VOCs	Research Triangle Park Laboratories
SW-846 Method 0100/TO-11	Determination of carbonyls (formaldehyde, acetaldehyde)	Resolution Analytics
LUMEX instrument	Determination of elemental mercury (Hg ⁰)	ARCADIS G&M
Organic mercury methods	Determination of: monomethylmercury, dimethylmercury, and total mercury.	Frontier Geosciences (Landfills A, B, C, D, E) Studio Geochimica (Landfill E)

letters A, B, C, D, and E in parenthesis following the organization denote the landfill site for which the organization was the performing organization.

Where multiple organizations are listed, the letters A, B, C, D, and E in parenthesis following the organization denotes the landfill site for which the organization was the performing organization.

3.3.2 Control Technology Exit Sampling Analysis Methods

Table 3-4 lists the sampling, analysis and measurement methods that were followed at the control technology exit stack. As before, the table also included the name of the organizations that performed the procedures. ARCADIS staff performed the field collection of samples and associated data at this sampling location.

Table 3-4. Testing Methods for Control Technology Exit Gas

Procedure	Description	Organization Performing Analysis
EPA Method 1	Selection of traverse points	ARCADIS G&M
EPA Method 2	Determination of stack gas velocity and volumetric flow rate	ARCADIS G&M
EPA Method 3A	Determination of O ₂ and CO ₂ for flare stack gas molecular weight calculations	ARCADIS G&M
EPA Method 4	Determination of stack gas moisture	ARCADIS G&M
EPA Method 6C	Determination of SO ₂	ARCADIS G&M
EPA Method 7E	Determination of NO _x	ARCADIS G&M
EPA Method 10	Determination of CO	ARCADIS G&M
EPA Method 23	Determination of: PCDDs/PCDFs by Method 8290, PAHs by Method 8270 PCBs by Method 1668	ALTA Analytical Perspectives
EPA Method 25A	Determination of flare stack gas NMOCs, as THCs when total organic concentration was less than the 50 ppm Method 25C applicability threshold	ARCADIS G&M
EPA Method 26A	Determination of HCl	Resolution Analytics
EPA Method 29	Determination of toxic heavy metals	First Analytical Laboratories
LUMEX instrument	Determination of elemental mercury (Hg ⁰)	ARCADIS G&M

3.4 Field Test Sampling Operations Narrative

As stated earlier, sampling typically required a sample team with seven or more experienced samplers. Prior to the tests, site visits to each landfill were conducted to

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gather necessary information for developing the quality assurance project plans and making arrangements for the field tests. The ARCADIS field chief noted the availability of sample ports and made arrangements with the host facility to have them installed if suitable ports were absent. He confirmed that the necessary staging area was available and that needed electrical utilities were accessible.

Two or more days before the scheduled tests, ARCADIS staff transported its field sampling trailer to the site. The trailer carried the needed sampling instruments, supplies, and emission monitors. Typically, one day of on-site preparation was needed before the scheduled test began.

The actual sample collection required two full days. All measurements and samples were collected in triplicate. The test samples and the required QA samples (field blanks and spike samples) were prepared, recovered, and recorded on sample chain-of-custody forms on site. The samples were transported back to ARCADIS' offices in Durham, North Carolina, by ARCADIS' sampling truck-trailer. The sample custodian, together with the sampling crew chief, made the arrangements to deliver the samples to the subcontracted laboratories for analysis.

3.5 Variation from Test Methods or Planned Activities

The test program for the five landfills spanned over three and a half years. Results from the earlier tests were used to guide the later tests. Some of the originally planned test methods were substituted by other methods and are described in the following sections.

3.5.1 Method Exceptions

Laboratory analytical procedures followed those prescribed by the specified methods, with the following exceptions.

3.5.1.1 Raw Landfill Gas

Alternative method for the raw landfill gas samples included the following:

- Carbonyls were analyzed by EPA TO-11, instead of the originally selected Method 8315. Methods TO-11 and 8315 closely resemble each other.
- PAHs in the raw LFG were to be analyzed by SW-846 Method 8270 - The sample extracts resulting from the raw LFG were found to contain excessive amounts of non-PAH organics. In retrospect, this should have been expected as the LFG is organic-rich (~40%). In order to make the extracts safe for injection into the gas chromatograph mass spectrometer (GC/MS) (i.e., not cause instrument damage), they have to be diluted significantly. The high dilution makes the method detection levels for the target PAHs too high, resulting in “non-detects” at high detection limits. The planned analysis method could not produce PAH concentrations at the needed detection levels. The sample extracts are in storage and may be submitted for analysis if a suitable method is available. These analyses were deleted from the Landfills C, D, and E tests.
- PCBs in the raw LFG were analyzed by EPA Method 1668 (EPA 812/R-97-001) as specified in the QAPP. However, similar to the difficulties experienced for the PAH analysis, in order to make the extracts safe to be injected into the GC, they have to be diluted excessively. The planned analysis method could not produce the desired results at the needed detection levels. These analyses were deleted from the Landfills C, D and E tests.
- NMOCs were analyzed by the GC/MS Method as described in EPA Publication EPA/600-R-98/16.
- VOCs and CH₄ were analyzed by EPA Method TO-15, with GC/MS and with GC/flame ionization detector (FID).
- Method 3C for the analysis of CH₄, CO₂, O₂, and N₂ was added to support the Method 25C analysis, as recommend by Method 25C.
- For Landfills C, D, and E, the sampling procedure for dimethylmercury was altered by reducing the sample size volume on the Carbotrap from 10 L to 0.5 L.

3.5.1.2 Control Device Exit

Alternative method for the control device exit samples included the following:

- Method 25A was to evaluate organic compound concentrations in the combustion outlet because of the low concentrations detected in Phase 1 sites. Method 25C is applicable at concentrations of 50 ppmv or more. However, test results showed that the IC engines exhaust gases contained several hundred ppm of THCs. Therefore, for any future field tests for IC engines, Method 25C should be used to quantify NMOCs rather than Method 25A.
- For Method 23 samples collected at Landfill C, analyses for PAHs were performed by CARB Method 429 as opposed to Method 8270. However, these methods are comparable. CARB Method 429 contains procedures for sampling, sample recovery, clean-up, and analysis. Method 8270 is strictly an analytical method. CARB Method 429 is specific to 19 PAHs, the target analytes of this portion of the specified tests. The 19 PAHs are a subset of the 200+ target analytes listed for Method 8270 for semivolatile organic compounds (SVOCs). Though specific compounds called out for use in instrument performance verifications, internal standard preparation, surrogate standards and continuing calibration verifications/calibration checks are slightly different, both methods require them. CARB Method 429 adds another level of QC with a required recovery standard. Method performance and acceptance criteria for recoveries are better defined in CARB Method 429 and meet or exceed those stated in Method 8270C. As long as any additional compounds reported by the laboratory using CARB Method 429 are included in the calibration standards and acceptable response factors are demonstrated, using CARB Method 429 is essentially equivalent to using SW-846 Method 8270.
- As a result of examining the test results from Landfill A, which showed very low concentrations of PCDDs/PCDFs/PAHs at the exit of an enclosed flare, no Method 23 sampling was conducted at Landfill D, also a site with an enclosed flare. A decision was made to not sample for PCDDs/PCDFs at the exit of the enclosed flare systems because the combustion gas temperature conditions found in the exit of an enclosed flare system were not likely to allow the formation of PCDDs/PCDFs. This also eliminated analysis of PAHs which uses the same sample.

4. Test Results

The following sections present data summaries of the measurements that were planned and conducted. Section 4.1 and its subsections present data related to the raw LFG. Section 4.2 and its subsections present data for the combustion exhaust gases at the exit of the flares, engines, and boiler.

4.1 Raw Landfill Gas

4.1.1 Landfill Gas Flow Rate and Temperature

Table 4-1 presents information regarding the LFG flow rate for each landfill. The LFG flowrate ranged from a low of 400 scfm for Landfill D to over 4000 scfm for Landfill E. Landfill E was a much larger landfill as it was reported to have over 14 million tons of waste in place, while Landfill D had about 2.4 million tons of waste.

The LFG header pipes at all the landfills did not have sufficiently long straight pipe sections to allow ideal EPA Method 2 gas velocity measurements. Velocity measurements were made under non-ideal conditions and were able to provide crude estimates of the LFG flowrates. For the purpose of this study, the estimated LFG flowrates were judged to be sufficiently accurate. For their intended use to estimate pollutant emission rates, the added cost of needed improvement of the landfill gas header piping system, and associated potential schedule delay, were not warranted.

Temperature of the LFG ranged from 54 to 71°F. Landfill E, with the largest volume of LFG, also had the highest measured LFG temperature.

4.1.2 Landfill Gas Constituent Concentrations

The principal focus of this test program was to determine the constituents that were present in the raw LFG. The major constituents consist of CH₄, CO₂, N₂, O₂ and moisture. These constituents were present in percent levels. Other constituents were the various organic compounds which were present in ppm or lower concentrations. Landfill gas also contained mercury including methyl- and dimethylmercury.

Table 4-1. Raw LFG Flow Rates

Parameter	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
Facility flowrate readings (scfm)	1650 – 1700 J	1500 J	550 – 600 J	400 J	4340 J
ARCADIS measured flow rate by pitot probe (scfm)	1580 J	1745 J	700 J	380 -850 J	3860 J
LFG gas temperature (°F)	57	62	56	54	71
Reported amount of waste (ton)	2,700,000 in 2003	4,000,000 in 2003	6,400,000 in 2004	2,350,000 in 2004	14,500,000 in 2005
Header pipe inner diameter (in)	12	11	14	11	16
Straight pipe upstream (No. of pipe diameters)	~8	< 2	> 8	> 8	< 2
Straight Pipe Downstream (No. of pipe diameters)	~4	< 2	> 8	> 8	< 2
Vacuum in header pipe, Inches water column (WC.)	34 - 35	--	21	---	--

J –Estimated value per EPA/G-8 guidance

4.1.2.1 Major Constituents (CH₄, CO₂, O₂) by Method 3C and NMOCs by Method 25

Table 4-2 presents the concentrations of the major LFG constituent components and NMOCs. The table provides the range and average for each of the constituent concentrations.

The concentrations CH₄, CO₂, O₂, N₂, moisture and NMOCs varied over quite a wide range between the landfills. In particular, Landfill D showed unusually high CH₄ content of more than 55 percent. Landfill B showed the lowest methane concentration, at just below 40 percent.

Table 4-2. Raw LFG Major Constituents

	Constituent		Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
Method 25C	Methane (% v/v)	Range	48.0 – 49.8	37.7 – 40.6	54.6 – 57.7	57.4 – 59.5	46.7 – 50.9
		Average	48.8	39.2	56.0	58.6	49.5
	Carbon Dioxide (% v/v)	Range	38.1 – 39.4	29.5 – 31.9	45.2 – 47.2	40.2 – 41.7	33.3 – 36.3
Average		38.7	30.7	46.2	41.0	35.3	
	NMOC (ppm as hexane)	Range	297 – 491	314 – 377	3650 – 9330	971 -1024	194 – 288
		Average	374	355	5870	1006	233
Method 3C	Methane (% v/v)	Range	43.5 – 45.4	35.2 – 37.3	47.4 – 49.1	54.3 – 55.6	46.8 – 51.7
		Average	44.5	36.1	48.0	55.1	49.5
	Carbon Dioxide (% v/v)	Range	35.2 – 36.9	28.2 – 29.9	35.4 – 36.9	37.6 – 38.5	30.2 – 31.9
		Average	36.1	29.0	35.9	38.1	31.3
Oxygen (% v/v)	Range	1.6 - 1.8	6.0 - 6.6	1.4 – 1.9	0.01 - 0.02	2.1 - 3.4	
	Average	1.7	6.4	1.6	0.02	2.6	
Nitrogen (% v/v)	Range	12.7 – 13.4	24.4 – 26.2	13.5 – 18.9	9.5 – 12.8	11.9 - 16.4	
	Average	13.1	25.6	15.9	11.2	13.6	
Method 23	Moisture (% v/v)	Range	11.6 – 12.3	1.8 – 2.1	NM	NM	NM
		Average	12.0	2.0			

NM – Not measured because moisture data were obtained by Method 23, which were not conducted during these tests.

All values are reported on an as-is basis, without correction for nitrogen-indicated potential air infiltration.

Data on the moisture in the LFG were only available for Landfills A and B because the data is a computed output of the Method 23 sampling procedure. Method 23 samples were collected for PAH and PCB analysis. This procedure was deleted from the test program after experiences with Landfills A and B samples revealed that the analysis could not be done. More explanation of this finding will be presented later in this report. Without Method 23 sampling for Landfills C, D, E, no moisture data were collected.

4.1.2.2 Other Constituents

In addition to the major constituents, the other lower concentration constituents were of interest because of their potential to cause adverse health effects. The following sections summarize the results related to these compounds.

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4.1.2.2.1 VOCs by Method 0040 with TO-15

Table 4-3 presents the average concentrations of the target volatile organic compounds. The concentration data were obtained by summa canister samples collected using Method 40 procedures. Analysis was performed by Method TO-15, with gas chromatography and mass spectrometry (GC/MS). The alkanes (C2 through C6), being present in much higher concentrations, were analyzed by GC flame ionization detection (FID).

Table 4-3. Raw LFG Volatile Organic Compounds

Compound	Unit	Method Detection Limit (NDL) Range ^a		Average Concentration ^b				
				Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
By gas chromatography flame ionization detector (GC/FID)								
Ethane	Part per million by vol (ppmv)	1	1	6.2	4.6	14.3	5.6	14
Propane	ppmv	1	1	8.9	5.9	40.0	30.5	13.0
Butane	ppmv	1	1	4.9	3.3	37.9	ND	3.6
Pentane	ppmv	1	1	3.2	2.6	26.6	2.4	1
Hexane	ppmv	1	1	Not Detected (ND)	ND	28.4	2.5	ND
By TO-15 gas chromatography and mass spectrometer (GC/MS)								
Dichlorodifluoromethane (Freon 12)	Part per billion by vol (ppbv)	0.2	0.3	118	468	1600	1240	232
1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	ppbv	0.2	0.2	8	44	127	110	15.3
Chloromethane	ppbv	0.1	0.2	12	72	1263	232	ND
Vinyl chloride	ppbv	0.2	0.2	97	410	768	1200	63
1,3-Butadiene ((Vinylethylene)	ppbv	0.2	0.3	22	89	642	326	ND
Bromomethane (Methyl Bromide)	ppbv	0.2	0.2	16	46	23	2.8	ND
Chloroethane (Ethyl Chloride)	ppbv	0.2	0.2	770	1880	30400	634	ND
Trichloromonofluoromethane (CFC11)	ppbv	0.2	0.2	51	327	504	116	8.1

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Compound	Unit	Method Detection Limit (NDL) Range ^a		Average Concentration ^b				
				Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
1,1-Dichloroethene	ppbv	0.2	0.2	1.7	8	55	21	ND J
1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	ppbv	0.2	0.2	2.0	11	39	19	ND
Carbon Disulfide	ppbv	0.2	0.3	14.4	134	157	93	339
Ethanol	ppbv	0.2	0.2	19.7 J	202	172	394	ND J
Isopropyl Alcohol (2-Propanol)	ppbv	0.2	0.2	114 J	356	1280	6630	2360 J
Methylene chloride (Dichloromethane)	ppbv	0.1	0.2	997	169	5350	1110	3050
Dimethyl sulfide	ppbv	20	20	ND	ND	68	ND	ND
Acetone	ppbv	0.2	0.3	328	1610	11700	12800	15500
t-1,2-dichloroethene	ppbv	0.2	0.3	2.7	9	42	53	ND
Hexane	ppbv	0.2	0.3	2470 J	1950	4940	3980	597 J
Methyl-t-butyl ether (MTBE)	ppbv	0.2	0.3	54.4	177	257	39	ND
1,1-Dichloroethane	ppbv	0.2	0.4	33.4	178	423	591	ND
Vinyl Acetate	ppbv	0.2	0.5	242	686	24	44	111
cis-1,2-Dichloroethene	ppbv	0.2	0.3	74.1	292	1640	1780	163
Cyclohexane	ppbv	0.2	0.3	165	734	3300	2270	ND
Chloroform	ppbv	0.2	0.3	40	190	744	485	ND
Ethyl Acetate	ppbv	0.2	0.3	1830	2310	1420	4600	ND
Carbon Tetrachloride	ppbv	0.2	0.5	0.8	5	ND	38	ND
Tetrahydrofuran (Diethylene Oxide)	ppbv	0.2	0.4	1180	882	1170	2060	ND
1,1,1-Trichloroethane	ppbv	0.2	0.5	4.9	31	ND	ND	ND
2-Butanone (Methyl Ethyl Ketone)	ppbv	0.2	0.3	273	1430	4570	8070	2490
Heptane	ppbv	0.2	0.2	242	918	2860	3580	331
Benzene	ppbv	0.2	0.2	73	251	1630	1200	887
1,2-Dichloroethane	ppbv	0.2	0.3	1.0	5	37	22	ND
Trichloroethylene (Trichloroethene)	ppbv	0.2	0.2	28.0	103	515	418	93.9
1,2-Dichloropropane	ppbv	0.2	0.3	0.8	5	ND	ND	ND
Bromodichloromethane	ppbv	0.2	0.2	2.6	10	ND	ND	ND
1,4-Dioxane (1,4-Diethylene Dioxide)	ppbv	0.2	0.2	1.9	9.4	7	12	ND
cis-1,3-Dichloropropene	ppbv	0.2	0.2	0.2	1.4	ND	4	ND
Toluene (Methyl Benzene)	ppbv	0.2	0.3	1330	6770	23300	30300	7950
4-Methyl-2-pentanone (MIBK)	ppbv	0.2	0.2	1070	886	2170	ND	ND

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Compound	Unit	Method Detection Limit (NDL) Range ^a		Average Concentration ^b				
				Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
t-1,3-Dichloropropene	ppbv	0.2	0.2	0.3	3	33	8	ND
Tetrachloroethylene (Perchloroethylene)	ppbv	0.2	0.3	42.1	176	1690	1020	125
1,1,2-Trichloroethane	ppbv	0.2	0.2	7.6	39	445	ND	ND
Dibromochloromethane	ppbv	0.2	0.2	ND	16	9	16	ND
1,2-Dibromoethane (Ethylene dibromide)	ppbv	0.2	0.2	1.1	7	21	ND	ND
2-Hexanone (Methyl Butyl Ketone)	ppbv	0.2	0.2	557	441	ND	ND	ND
Methyl Mercaptan (Methanethiol)	ppbv	20	20	ND	ND	ND	ND	ND
Ethylbenzene	ppbv	0.2	0.3	575	2800	5890	8120	ND
Chlorobenzene	ppbv	0.2	0.2	195	229 J	833	21	135
m/p-Xylene (Dimethyl Benzene)	ppbv	0.2	0.65	3730 J	3980	9200	13600	9000 J
o-Xylene (Dimethyl Benzene)	ppbv	0.2	0.3	300	1410	3660	5410	3100
Styrene (Vinylbenzene)	ppbv	0.1	0.2	29.5	222	1270	1180	420
Tribromomethane (Bromoform)	ppbv	0.2	0.3	0.4	ND	16	9	ND
1,1,1,2-Tetrachloroethane	ppbv	0.2	0.2	29.9	ND	ND	ND	ND
1-Ethyl-4-methylbenzene (4- Ethyl Toluene) see Note c	ppbv	0.2	0.2	79.3 J	386 J	894 J	976 J	2510
1,3,5-Trimethylbenzene see Note c	ppbv	0.2	0.2	79.3 J	386 J	894 J	976 J	1040
1,2,4-Trimethylbenzene	ppbv	0.2	0.3	193	949	1510	2190	2640
1,4-Dichlorobenzene	ppbv	0.2	0.3	43.4	255	328	686	ND
1,3-Dichlorobenzene	ppbv	0.2	0.3	0.5	2.03	394	650	ND
Benzyl Chloride	ppbv	0.2	0.2	6.3	20	ND	ND	ND
1,2-Dichlorobenzene	ppbv	0.2	0.3	1.9	0.4	ND	31	ND
1,1,2,3,4,4-Hexachloro-1,3- butadiene	ppbv	0.2	0.2	1.2	5	ND	ND	ND
1,2,4-Trichlorobenzene	ppbv	0.2	0.3	1.0	5	ND	ND	ND
Acrylonitrile	ppbv	20	20	ND	ND	ND	ND	ND
Dichlorofluoromethane (Freon 21)	ppbv	20	20	ND	ND	ND	ND	ND
Chlorodifluoromethane (Freon 22)	ppbv	20	20	ND	ND	ND	ND	ND
Ethyl Mercaptan (Ethanediol)	ppbv	20	20	ND	ND	ND	ND	ND
Carbonyl Sulfide (Carbon oxysulfide)	ppbv	20	20	ND	ND	ND	ND	ND

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ND - Constituent not detected at the stated method detection limits

a – Method detection limits provided by analytical laboratory

b – In computing averages, when all measurements are ND, the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50% of the stated MDL. Though not applicable here, the method further specifies that if MDL is not reported, a ND measurement is treated as zero.

c - 1-Ethyl-4-methylbenzene (4-Ethyl Toluene) and 1,3,5-Trimethylbenzene co-eluted from the GC and also have the same quantitation ions, thus making them indistinguishable. Therefore, the reported values represent the combined concentrations of these two compounds.

J – Estimated value per EPA QA/G-8 guidance

4.1.2.2.2 Hydrogen Sulfide (H₂S) by Method 11

Table 4-4 present the concentrations of hydrogen sulfide measured with Method 11.

H₂S concentrations ranged from a low average concentration of 13 ppmv in Landfill A to a high average concentration of 322 ppmv for Landfill E.

Table 4-4. Raw LFG Hydrogen Sulfide

		Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
(mg/m ³)	Range	10.7 – 26.1	26.4 – 36.1	26.8 – 110.0	32.1 – 185.6	413 – 519
	Average	18.5	32.3	78.3	102.6	458 J
(ppmv)	Range	7.6 – 18.4	18.7 – 25.6	19.0 – 78.0	22.7 – 132	291 – 366
	Average	13.0	22.9	55.5	72.7	322 J

J Estimated value per EPA QA/G-8 guidance

4.1.2.2.3 Carbonyls by Method 0100 & 8315A

Table 4-5 presents the concentrations of formaldehyde and acetaldehyde. Notably, acetaldehyde was uniformly present at a higher concentration than formaldehyde.

Formaldehyde was present in the single-digit to low-tens of µg/m³. Acetaldehyde was present at concentration several times higher than formaldehyde.

Table 4-5. Raw LFG Carbonyls

			Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
Formaldehyde	($\mu\text{g}/\text{m}^3$)	Range	2.3 – 5.0	3.3 – 4.1	26.9 – 46.6	16.0 – 39.0	8.1 – 11.8
		Average	4.1	3.6 J	33.9	25.0	9.6
	($\times 10^{-3}$ ppmv)	Range	1.8 – 4.1	2.65 – 3.30	22.7 – 37.3	12.9 – 31.5	6.5 – 9.6
		Average	3.3	2.90 J	27.2	20.1	7.8
Acetaldehyde	($\mu\text{g}/\text{m}^3$)	Range	18.9 – 67.8	21.9 – 35.0	114 – 495	72 – 534	27.9 – 151
		Average	45.7	27.0	242	348	92.4
	($\times 10^{-3}$ ppmv)	Range	10.3 – 37.0	12.0 – 19.2	62.4 – 27.0	39 – 293	15.3 – 82.8
		Average	24.9	14.8	132	191	50.6

4.1.2.2.4 PAHs by Method 0010 with 8270

As discussed previously in Section 3.5.1.1, attempts to analyze the PAH concentrations in the raw LFG were unsuccessful.

4.1.2.2.5 PCBs by Method 0010 with 1668

As discussed previously in Section 3.5.1.1, attempts to analyze the PCB concentrations in the raw LFG were unsuccessful.

4.1.2.2.6 Mercury

Mercury comes in various forms. It can be bound to particulates or in a gaseous form. Gaseous mercury species is either organic or inorganic. Organic mercury or methyl mercury is more toxic and regarded as a priority for determining the potential release from U.S. landfills. Previous testing has identified both methyl and dimethyl mercury in landfills.

Metallic, or elemental mercury, is an inorganic form used in products such as electrical switches, fluorescent bulbs, and thermometers. It is a liquid and can evaporate into the air as a gas. Inorganic mercury compounds take the form of mercury salts. Oxidized mercury (sometimes called ionic or reactive gaseous mercury (RGM)) is found predominantly in water-soluble forms and may be deposited at a range of distances from sources depending on a variety of factors including topographic and meteorological conditions downwind of a source. Once mercury is deposited into bodies of water like lakes or streams, it can be converted to methyl mercury through microbial decomposition in soils and sediments. In this form, it is taken up by tiny aquatic plants and animals. Fish that eat these organisms build up methylmercury in

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their bodies. As ever-bigger fish eat smaller ones, the methylmercury is concentrated further up the food chain which is referred to as "bioaccumulation".

Table 4-6 summarizes the results of the mercury measurements which include organo-mercury (i.e., dimethyl and monomethyl), elemental mercury, and total gaseous mercury. Total mercury and organo-mercury were sampled and analyzed by the Organic mercury method. Elemental mercury was measured by the LUMEX instrument. Oxidized mercury was not analyzed directly but can be determined by subtracting elemental and organo-mercury from total mercury.

The dimethyl mercury data for Landfills A and B did not meet data quality objectives and the results were rejected due to low spike recoveries. During the Landfill A and B tests, total sample volumes collected for dimethyl mercury on the Carbotrap were approximately 10 L. The analysis of these samples resulted in poor recovery of spiked dimethyl mercury. According to the researchers of the analytical laboratory, the poor spike recoveries could be attributed to the migration of the spiked material during sampling. The extent of material migration was believed to be highly dependent on sample volume. Therefore spike recoveries in this instance could be improved by reducing the sample volume.

For Landfills C, D, and E, the sampling procedure for dimethyl mercury was altered by reducing the sample size volume on the Carbotrap from 10 L to 0.5 L. The modified procedure resulted in much improved spike recoveries. The details of the mercury measurement methods and method development experiences were included in the Landfill C, and D reports, which are provided in appendices to this document.

Most of the mercury found was in the elemental state. The concentrations of the organic forms of the mercury were about two orders of magnitude lower than the total and elemental mercury concentrations. The results are comparable to those reported by Lindberg et al. in 2005 for twelve landfills, although the total amount of mercury reported in Lindberg et. al. 2005 is as much as one order of magnitude greater than the total mercury reported here. In the Lindberg study, total gaseous Hg ranged from 10 to 12000 ng/m³. Dimethyl mercury ranged from 4.5 to 77 ng/m³ and monomethyl mercury ranged from non-detect to 39 ng/m³.

Total mercury concentration averages ranged from 204 to 1460 ng/m³. Of these amounts, elemental mercury was the highest component, with its averaged values ranging from 58 to 440 ng/m³. Dimethyl mercury was the next most prevalent. After discarding the Landfills A and B data because it did not meet data quality objectives, dimethyl mercury averaged concentrations ranged from 15 to 53 ng/m³ approximately.

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Monomethyl mercury was present at the lowest concentration, ranging from less than 1 to 5.4 ng/m³.

Using the total mercury measurements as the basis, the sum of the elemental, monomethyl and dimethyl mercury species contributed to about 28 to 49 percent of the total mercury measured. It is suspected that the majority of the remaining mercury is in the oxidized form.

Table 4-6. Raw LFG Mercury Compounds

			Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
Total	(ng/m ³)	Range Average	601 – 676 632	158 – 234 204	423 – 427 425	723 – 751 740	1330 – 1650 1460 ^a
	(X10 ⁻⁶ ppmv)	Range Average	72.4 – 81.4 76.1	17.7 – 26.2 22.8	50.9 – 51.4 51.2	87.0 – 90.4 89.1	149 – 184 163.5 ^a
Dimethyl	(ng/m ³)	Range Average	R R	R R	6.5 – 20.9 14.8	49.7 – 53.1 51.0	17.4 – 99.8 52.5 ^a
	(X10 ⁻⁶ ppmv)	Range Average	R R	R R	0.7 – 2.2 1.5	5.2 – 5.6 5.3	1.82 – 10.5 5.5 ^a
Monomethyl	(ng/m ³)	Range Average	ND – 1.2 0.4	1.1 – 1.3 1.2	3.1 – 5.4 3.9	2.40 - 2.64 2.47	3.4 – 8.2 5.4 ^a
	(X10 ⁻⁶ ppmv)	Range Average	ND – 0.13 0.04	0.12 – 0.15 0.13	0.35 – 0.60 0.44	0.264 – 0.296 0.278	0.380 – 0.920 0.61
Elemental	(ng/m ³)	Range Average	280 – 325 308	53 – 61 58	90 – 103 99	265 – 290 278	437 – 445 440
	(X10 ⁻⁶ ppmv)	Range Average	33.7 – 39.1 37.1	6.4 - 7.3 7.0	10.8 – 12.4 11.9	31.9 – 34.9 33.5	52.6 – 53.6 53.0

R – Data rejected because spike recovery for these measurements were below acceptable range

ND – Constituent not detected at the detection limit of 0.63 ng/m³

^a - Values are averages of Frontier and Geochimica results

4.1.2.2.7 Metals by Method 29

The standard Method 29 is the reference method to determine trace concentrations of the toxic metals. However, the method was designed for sample streams that are not rich in organic constituents because it uses a strong oxidizer, potassium permanganate solution, to capture the metals. The concern with applying this method to LFG was that the potassium permanganate might react violently with the organic constituents in the LFG. If that happened, the measurement would be invalidated and analysis might also pose safety risk to the sampling personnel. Therefore, it was not included in the test program.

4.2 Control Equipment Stack

The following subsections present the results obtained from measurements made at the control equipment stack.

4.2.1 Gas Flow Rate and Temperature

Table 4-7 presents the exhaust gas flowrates and their temperatures at the stack of the five control devices. The flowrates were obtained by velocity traverse measurements performed according to EPA Method 2. The flowrates reflected the size of the control equipment and ranged from 1310 scfm for the Landfill A engine to more than 28000 scfm for the Landfill E boiler.

The enclosed flares had the highest temperatures, at about 1400 °F. This was consistent with the nature of the process. Flares do not have active heat utilization and removal. The measured temperatures were lower than the expected flame temperatures because of the introduction of dilution air.

The boiler in Landfill E had the lowest exit temperature at about 480 °F. The observed temperature was consistent with typical boiler operations. The two reciprocating IC engines resulted in exhaust temperature around 735 °F for Landfill A's Caterpillar 3412 and 1000 °F for Landfill C's Caterpillar 3516. The Caterpillar 3516 was more than twice the size of the Caterpillar 3412.

Table 4-7. Control Equipment Exit Stack Flow Rate and Temperature

		Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
Control Technology		Reciprocating IC Engine	Enclosed Flare	Reciprocating IC Engine	Enclosed Ground Flare	Boiler
Unit Model		Caterpillar 3412	Perennial Energy	Caterpillar 3516	John Zink Model 72	Combustion Engineering 33-7KT-10 A Type
Size or Capacity		1649 cu. in displacement, 470KW	10.8 to 54 MMBtu/hr	4210 cu. in displacement, 800KW	4.0 to 20.9 MMBtu/hr	80,000 lb/hr 250 psi steam
LFG Flowrate into Equipment (scfm) ^a		150	1500	300	400	2430
Exit Flowrate (dscfm)	Range	1290 – 1340	19700 – 22000	1890 – 2000	7830 – 8290	26820 – 30400
	Average	1310	20700	1950	8080	28690
Exit Gas Temperature (°F)	Range	732 – 738	1359 – 1419	997 – 1038	1412 – 1446	476 – 488
	Average	735	1389	1016	1437	479

a – This is a crude estimate based on the measured exit flow rate, the measured exit oxygen concentration and the major constituent analysis of the LFG.

4.2.2 Exhaust Gas Constituent Concentrations

The following sections present the concentration and emission rates of the combustion products O₂, CO₂, CO, SO₂, NO_x, THCs, HCl, dioxin /furans, PAHs, and toxic heavy metals.

4.2.2.1 CEM Constituents (O₂, CO, CO₂, SO₂, NO_x)

Table 4-8 presents the average concentrations of O₂, CO, CO₂, SO₂, and NO_x found in the control devices' exhaust gases. For the most part, they are unremarkable, except for the very apparent and substantially higher concentrations of CO, THC and NO_x that are produced by the engines. The boiler was by far the most efficient combustion device as it produced the lowest concentrations of CO and THCs. The flares tended to produce more CO, especially if the more highly diluted flare exhaust gas was accounted for. In addition to producing higher concentrations of CO and THC, the engines also produced significantly higher concentrations of NO_x. The Landfill C engine, in particular, produced about 2700 ppm of NO_x, an alarmingly high level by any measure.

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Table 4-8. Control Equipment Exit O₂, CO, CO₂, SO₂, NO_x

		Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
O ₂ (% v/v)	Range	7.4 – 7.6	12.5 – 16.1	2.3 – 3.2	13.5 -13.5	7.2 – 7.9
	Average	7.5	14.9	2.7	13.5	7.5
CO ₂ (% v/v)	Range	12.8 – 13.2	2.9 – 4.8	15.6 – 16.5	6.3 – 6.4	12.1 -12.5
	Average	12.9	4.2	16.3	6.4	12.3
Moisture (% v/v)	Range	11.3 – 12.5	5.8 – 7.3	16.2 - 18.3	7.9 – 10.3	11.6 – 14.1
	Average	12.1	6.5	17.0	8.4	12.6
CO (ppmv)	Range	549 – 570	11 – 13	556 – 585	69 -92	ND – 14
	Average	560	10	568	80	9
SO ₂ (ppmv)	Range	29 – 39	3 – 8	–ND	ND	41 – 68
	Average	34	6	ND	ND	55
NO _x (ppmv)	Range	142 – 183	10 – 12	2280 – 3150	7.7 – 9.7	3 – 21
	Average	166	11	2730	8.5	13
Remarks			0.6 sec at 1400 °F			

ND – Constituent not detected at the detection limit of 2.0 ppmv

4.2.2.2 Other Constituents

4.2.2.2.1 THCs by Method 25A

Table 4-9 presents the concentrations of organic materials found in the control device exhaust gases. The measurement was made with a continuous emission monitor, in

Table 4-9. Control Equipment Exit Total Hydrocarbon

		Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
As Propane, (ppmv)	Range	645 – 786	ND – 6	893 – 994	31.3 – 35.6	ND
	Average	730	4	940	34.1	ND
As Hexane, (ppmv)	Range	323 – 393	ND – 3	447 – 497	15.7 – 17.8	ND
	Average	365	2	470	17.1	ND

ND – Constituent not detected at the detection limit of 1.0 ppmv

accordance with Method 25A. Hydrocarbons concentrations were low for Landfill E's boiler, fluctuating near the bottom of the instruments zero point. They were also very low for Landfill B's flare. Landfill D's flare had a bit more THC in its stack gas, at about 17 ppm hexane. In contrast, both IC engines produced exhaust gases that contained more than 350 ppm of hexane-equivalent hydrocarbons.

The purpose of this measurement was to determine the amount of hydrocarbons in the exhaust gases. Method 25A is suitable for this purpose. Moreover, identification and quantitation of individual organic compounds were not objectives of this test program. For future field tests, when there is a requirement to identify organic constituent species in engine exhausts, we would recommend using EPA Method 40, which is well suited to identify and quantify volatile organic compounds.

This project included measurements for PCDD/PCDFs and PAHs in the stack gases and these data are presented later in this report.

4.2.2.2.2 Dioxin/Furans by Method 23 with 8290

Combustion processes with chlorinated compounds have the potential of producing polychlorinated dioxins and furans (PCDD/PCDF). This is particularly relevant if the combustion is not efficient and if the combustion products are allowed to cool down slowly where they can come into contact with a particle-laden surface.

Sampling for PCDD/PCDFs was performed for all landfills except for Landfill D, which used an enclosed flare. The decision to exclude Landfill D was based on two considerations. Tests at Landfill B where enclosed flare was used resulted in PCDD/PCDF data that were mostly below detection limits. Further, these findings were consistent with the understanding that the flare exit gases could not possibly be cooled to reach temperatures that were favorable to dioxin formation. Given the high cost of sampling and analysis for PCDD/OCDF, it was decided not to conduct PCDD/PCDFs at the second enclosed flare site.

Table 4-10 presents the PCDD/PCDF concentrations. As can be seen, PCDD/PCDFs were mostly below detection limits, except for Landfill E. The boiler in Landfill E is a device that is understood to have the potential to present the conditions that favors PCDD/PCDF formation, which was confirmed.

4.2.2.2.3 PAHs by Method 0010 with 8270

Table 4-11 presents the concentrations of PAHs in the combustion stack gases. Consistent with the THC data presented earlier, the IC engines resulted in the highest

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concentrations of PAHs. In an attempt to provide a means of comparing the control technologies, Table 4-11 included a normalized PAH emission factor expressed as the amount of PAHs emitted per cu. ft. of LFG combusted. As shown, the IC engine at Landfill C was found to emit the highest amount of PAHs at 0.01 mg/cu. ft. LFG. In contrast, the boiler at Landfill E and the flare at Landfill B were both found to emit 0.003 mg/cu. ft. LFG.

4.2.2.2.4 HCl by Method 26A

Table 4-12 presents the HCl concentrations at the control device stacks. They ranged from about 0.9 to 14 ppmv (1.4 to 21 mg/m³).

4.2.2.2.5 Metals by Method 29

Table 4-13 presents the metals found in the control equipment stack. The flares and the engines have low emission rates compared to the boiler. The reason for the generally higher metal emissions from the boiler is not understood.

Table 4-10. Control Equipment Exit Dioxins and Furans Average Concentrations ^a

Concentration (x10 ⁻³ ng/dscm)	Landfill A	Landfill B	Landfill C	Landfill E
Number of Samples Contributing to Average	1	1	3	3
Dioxins				
2,3,7,8-TCDD	ND	ND	ND	0.926
Other TCDD	22.0	11.3	8.2	75.5
1,2,3,7,8-PeCDD	ND	ND	ND	2.6
Other PeCDD	3.4	13.6	3.4	76.6
1,2,3,4,7,8-HxCDD	ND	ND	ND	3.3
1,2,3,6,7,8-HxCDD	ND	ND	ND	6.2
1,2,3,7,8,9-HxCDD	ND	ND	ND	4.5
Other HxCDD	0.2393	4.1	1.2	71.1
1,2,3,4,6,7,8-HpCDD	ND	ND	ND	28.0
Other HpCDD	0	2.4	0	28.5
1,2,3,4,6,7,8,9-OCDD	ND	ND	3.7	43.6
Total CDD	< 33.8	<34.7	ND	341
Furans				
2,3,7,8-TCDF	ND	0.5867	ND	5.8
Other TCDF	46.6	0.0088	0.75	176
1,2,3,7,8-PeCDF	ND	1.1	ND	9.2

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Concentration (x10 ⁻³ ng/dscm)	Landfill A	Landfill B	Landfill C	Landfill E
Number of Samples Contributing to Average	1	1	3	3
Dioxins				
2,3,4,7,8-PeCDF	ND	1.0	ND	12.8
Other PeCDF	3.4	110	0	119
1,2,3,4,7,8-HxCDF	ND	1.1	ND	11.8
1,2,3,6,7,8-HxCDF	ND	0.166	ND	11.6
2,3,4,6,7,8-HxCDF	ND	0.194	ND	11.8
1,2,3,7,8,9-HxCDF	ND	0.218	ND	3.1
Other HxCDF	1.3	34.7	0	59.4
1,2,3,4,6,7,8-HpCDF	ND	0.158	ND	29.6
1,2,3,4,7,8,9-HpCDF	ND	0.215	ND	3.8
Other HpCDF	0	4.6	0	10.8
1,2,3,4,6,7,8,9-OCDF	ND	1.1	ND	11.1
Total CDF	13.9	156	ND	300
Total CDD/CDF	< 47.6	190	ND	640

a – Landfill D was not measured for PCDD/PCDFs.

ND – Constituent not detected.

< - indicates that the concentration of the constituent is less than the listed value. In all cases the number reported is rounded up to the nearest tenth.

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Table 4-11. Control Equipment Exit Averaged PAH Emissions ^a

Concentration (ng/dscm)	Landfill A	Landfill B	Landfill C	Landfill E
	IC Reciprocating Engine	Enclosed Flare	IC Reciprocating Engine	Boiler
Number of Samples Contributing to Average	1	1	3	3
Acenaphthene	521	16.2	555	49.3
Acenaphthylene	731	3.1	1,510	10.2
Anthracene	116	8.3	372	33.6
Benzo(a)anthracene	41	2.5	62.2	302
Benzo(a)pyrene	3.2	1.1	3.1	233
Benzo(b)fluoranthene	22	3.1	45.3	659
Benzo(g,h,i)perylene	15	2.5	6.1	248
Benzo(k)fluoranthene	6.4	1.0	10.8	240
Chrysene	144	2.5	165	512
Dibenzo(a,h)anthracene	3.2	0.3	2.9	63.3
Fluoranthene	154	22.4	361	1400
Fluorene	950	319	707	74.5
Indeno(1,2,3-cd)pyrene	6.6	1.2	8.3	277
Naphthalene	17,900	4,060	43,000	785
Phenanthrene	1,900	12	2,670	1,200
Pyrene	175	18	290	832
2-Methylnaphthalene	7,580	3460	6,700	650
Benzo(e)Pyrene	17	2.5	30.8	355
Perylene	3.1	0.4	1.0	40.3
Total PAH	30,300	7,930	56,500	7,960
Estimated LFG Inlet flow Rate (scfm)	150 J	1500	300	2430
Measured Exit Gas Flow Rate, average (scfm)	1,310	20,700	1,950	28,700
Total Emission Rate, (mg/ft ³ LFG)	0.007	0.003	0.010	0.003

^a – Landfill D was not measured for PAHs.

J Estimated value per EPA QA/G-8 guidance

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Table 4-12. Control Equipment Exit HCl

		Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
(mg/m ³)	Range	4.1 – 4.4	1.4 – 2.1	13.8 - 20.6	2.0 – 2.2	2.0 – 2.4
	Average	4.3	1.7	18.0	2.2	2.1
(ppmv)	Range	2.7 – 2.8	0.9 – 1.4	9.1 – 14.3	1.3 – 1.3	1.3 – 1.6
	Average	2.7	1.1	12.0	1.3	1.4
(lb/hr)	Range	0.0197 – 0.0213	0.11 – 0.16	0.103 – 0.163	0.06 – 0.06	0.21 – 0.26
	Average	0.0203	0.13	0.136	0.06	0.23

Table 4-13. Control Equipment Exit Metal Emissions

		Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
Estimated LFG Inlet flow Rate	(scfm)	~ 150	1500	300	400	2430
Arsenic	µg/dscm	3.0	0.70	3.13	4.7	2.3
	X 10 ⁻⁶ lb/hr	15	66	22.6	142	221
	X 10 ⁻⁹ lb/scf LFG	1.7	0.7	1.3	5.91	1.5
Cadmium	µg/dscm	0.37	0.18	0.574	0.209	1.2
	X 10 ⁻⁶ lb/hr	1.8	14.5	4.1	6.3	135
	X 10 ⁻⁹ lb/scf LFG	0.2	0.16	0.23	0.26	0.93
Chromium	µg/dscm	8.5	1.7	4.4	4.1	10
	X 10 ⁻⁶ lb/hr	41.4	132	31.6	122	1,200
	X 10 ⁻⁹ lb/scf LFG	0.46	147	1.8	5.1	8.2
Lead	µg/dscm	6.1	0.65	0.52	ND	6.0
	X 10 ⁻⁶ lb/hr	29.5	52	3.7	ND	649
	X 10 ⁻⁹ lb/scf LFG	3.2	0.6	0.21	ND	4.5
Manganese	µg/dscm	13.5	8.3	5.4	7.9	4.0
	X 10 ⁻⁶ lb/hr	66.2	660	38.5	236	439
	X 10 ⁻⁹ lb/scf LFG	7.4	7.3	2.1	9.8	3.0
Mercury	µg/dscm	ND	ND	ND	ND	0.46
	X 10 ⁻⁶ lb/hr	ND	ND	ND	ND	50
	X 10 ⁻⁹ lb/scf LFG	ND	ND	ND	ND	0.23
Nickel	µg/dscm	9.5	1.8	18	4.8	47
	X 10 ⁻⁶ lb/hr	47	140	126	144	5300
	X 10 ⁻⁹ lb/scf LFG	5.2	1.6	7.0	6.0	36.4

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5. Discussions of results

5.1 Comparison with AP-42 Default Values

Table 5-1 provides a comparison of the field test results of the five landfills to existing AP-42 values for landfill gas. The table also identifies the test method and detection limit for each constituent evaluated in the raw landfill gas. Of the forty-four AP-42 values, twenty-nine constituents were found to have average concentrations that are half or lower than their corresponding AP-42 for all five landfills. Twelve of these twenty-nine constituents were present at average concentrations that were no more than one-tenth of the AP-42 values. These twelve compounds are:

1,1,1-trichloroethane; 1,1,2,2-tetrachloroethane; 1,2-dichloroethane; 1,2-dichloropropane; isopropyl alcohol; bromodichloromethane; dichlorodifluoromethane; ethane; ethanol; t-1,2-dichloroethene; trichloroethylene; and vinyl chloride. For acrylonitrile, non-detects were reported for each of the five landfills.

For sixteen constituents, at least one landfill has a concentration greater than the existing AP-42 value. The concentrations that are greater than the existing AP-42 values for at least one of the five landfills are highlighted in the table. These compounds were: acetone, carbon tetrachloride, chlorobenzene, chloroethane, chloroform, chloromethane, dichlorobenzene (1,4; 1,3; and 1,2), ethylbenzene, 1,2-dibromomethane, hexane, hydrogen sulfide, methyl ethyl ketone, pentane, and nonmethane organic compounds. Four compounds were present at average concentrations at least three times their AP-42 default values [i.e., carbon tetrachloride (3.6x), chloroethane (6.7x), chloroform (12x), and 1,2-dibromoethane (10x)].

Twenty six compounds were found to be present in concentrations that are similar to the AP-42 default values, i.e. their averaged concentrations were between 50 to 300% the AP-42 default values. These compounds were: 1,1-dichloroethane; 1,1-dichloroethene; acetone; butane; carbon disulfide; chlorobenzene; chloromethane; 1,4-dichlorobenzene; 1,3-dichlorobenzene; 1,2-dichlorobenzene; methylene chloride; ethylbenzene; trichloromonofluoromethane; hexane; hydrogen sulfide; mercury (total); 2-butanone; 2-hexanone; pentane; tetrachloroethylene; propane; m/p-xylene; o-xylene; benzene; NMOC as Hexane; and toluene.

These data will be of help in providing: (1) QA of industry-supplied data; (2) filling data gaps in the existing sets of LFG emission factors; and (3) updating existing emission factors within AP-42. The inclusion of these data will undergo protocols for AP-42 emission factor development including addressing uncertainty and data quality.

5.2 Control Technology Assessment

Among the three tested control technologies (i.e., enclosed ground flare, IC engine and boiler) the boiler was the one capable of destroying the LFG most effectively, as evidenced by the very low concentrations of organic compounds that exited the boiler stack. However, the boiler does have a higher affinity to form PCDDs and PCDFs than the flares or the engines. A more detailed review of the PCDD/PCDF data may be warranted to assess the potential impacts of the levels of these compounds that were formed.

IC engines do not appear to destroy landfill gas constituents as effectively as boilers or flares. This could be due to tuning or maintenance of the engine. Also, engines are typically operated to minimize NO_x and CO emissions which will result in decreasing NMOC destruction efficiency. In assessing potential impacts from use of IC engines for landfill gas control, pollution prevention tradeoffs can be considered from offsetting power generation at a coal-fired electric utility (EPA-600/R-95-089). Often electricity from IC engines powered on landfill gas is used to help meet peak load energy demands.

Enclosed ground flares are simple devices and are easier to maintain and operate as compared to a boiler or IC engine. They do not have the benefits of IC engines or boilers in offsetting fossil fuel use and providing methane for utilization. However, the two enclosed flares evaluated in this project were found to effectively control hydrocarbons and organic constituents.

5.3 Mercury Measurements

The technology of sampling and analyzing for mercury species is progressing steadily. The current state of technology requires very specific knowledge that does not transfer readily. The development of a method that can be promulgated as an EPA standard procedure would be helpful in future research with mercury emissions.

This notwithstanding, mercury measurement technology appears to be on the cusp of becoming more "main-stream." Mercury's inclusion in future research studies should be considered favorably, especially if the per-sample cost will go down because of maturing of the technique and increased competition in the market place. However, the use of independent standards is recommended for primary standard verification, spike recoveries and blanks to provide quality assurance of the results.

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Technical Systems Audits (TSAs) were conducted for the organo-mercury sampling and analysis since this is not a standard EPA test method. One potential source of error in any analysis is due to the standards used to calibrate the instrumentation. Several issues were noted concerning the calibration standards. The first issue was the apparent inability to verify the concentrations of the standards used to calibrate the instrumentation used to measure MMHg and DMHg. The lack of an independent standard to verify the primary standard is a cause of concern because any inaccuracies in the primary standard will be promulgated throughout the analyses. It is recommended that Frontier Geosciences or any other laboratory conducting organo-mercury analyses identify stable standards for use as an independent verification of the primary standard.

A second issue concerned how the calibration standards were stored. No expiration dates were available for either the MMHg and DMHg standard materials. All standards have a limited "shelf life" and should not be used after they have expired. It was not clear if records were kept to prevent use of expired standards. It is recommended that this become part of the standard operating procedures (SOPs) to prevent use of standards that have degraded over time.

A third issue was raised regarding how the standards were stored. The QA officer found the MMHg analytical standard stored in a clear Teflon bottle, un-refrigerated in front of a large window. The work plan had requested that samples and standards be kept refrigerated and away from light.

The QA officer also recommended that standard practice should include retaining an aliquot of spike solution or spiked traps when sending media to a field project.

The QA officer also noted several potential issues associated with the organo-mercury analyses. One area of concern was the instability of the MMHg instrument. The analyst responsible for MMHg analysis indicated that it was common to have to recalibrate and reanalyze samples. One suggestion to improve the robustness of MMHg analysis is the inclusion of analytical spikes. Additionally calibration verification samples should be analyzed frequently to ensure that the calibration is still acceptable, i.e. the instrument has not drifted. Data validation of MMHg analyses must include verification of the initial calibration, spike recoveries and calibration stability. Another area of concern is the practice of forcing the calibration curve through zero. This procedure is not consistent with most EPA-promulgated methods. Retention times during MMHg analysis should be carefully monitored. This is critical given that identification of MMHg is determined by retention times or relative retention times.

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Careful monitoring of retention times must become part of MMHg analysis. The final observation made by the ARCADIS QA officer was that the digestate dilution technique was not acceptably performed. The glassware used to bring the digested samples to volume was not calibrated to Class A or Class B glassware. Furthermore the glassware used was not compared against calibrated glassware. Inaccurate dilution of the digestates is a common source of error in analysis where dilution is required. It is recommended that Frontier Geosciences or any other lab performing these analyses should modify their procedures to ensure accurate dilution of samples. This can be done using calibrated glassware or by using a calibrated balance to determine the dilution gravimetrically.

In addition to the TSA, an internal performance audit was performed by the ARCADIS QA officer. Audit samples for THg, MMHg and DMHg were prepared by Cebam Analytical located in Seattle, Washington. These audit samples were analyzed by Frontier Geosciences as described in the report titled *Determination of Total, Dimethyl, and Monomethyl Mercury in Raw Landfill Gass at Pinconning and Montrose Michigan*. These results are present in Tables 5-3, 5-4, and 5-5. In summary the results met the MQOs for recovery and the RPD between duplicate samples was also acceptable. However, the recovery MQO of 50-150 percent makes it nearly impossible to reasonably close a mass balance around Mercury. The measurement of the MMHg audit samples showed the worst recoveries of the various Hg species, indicating that MMHg analyses are more than likely the least robust of the analyses. Inclusion of the suggestions listed above should increase the accuracy and precession of THg, MMHg, and DMHg analyses. Mercury measurements from landfill gas are still in development, but improvements have been made.

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Table 5-1. Comparison between LFG Constituent Concentrations and AP-42 Default Values

Method	Compound	CAS Number	Formula Weight	Concentration (ppmv)						
				Default Value	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E	Detection Limit
M-40	1,1,1-Trichloroethane	71-55-6	133.42	0.48	0.005	0.031	ND	ND	ND	0.0003
M-40	1,1,2,2-Tetrachloroethane	79-34-5	167.85	1.11	0.0290	ND	ND	ND	ND	0.0002
M-40	1,1-Dichloroethane (Ethylidene Dichloride)	75-34-3	98.96	2.35	0.033	0.178	0.423	0.591	ND	0.0003
M-40	1,1-dichloroethene	75-35-4	96.94	0.20	0.002	0.008	0.055	0.021	ND	0.0002
M-40	1,2-Dichloroethane	107-06-2	98.96	0.41	0.001	0.005	0.037	0.022	ND	0.0003
M-40	1,2-Dichloropropane	78-87-5	112.98	0.18	0.001	0.005	ND	ND	ND	0.0003
M-40	Isopropyl alcohol (2-Propanol)	67-63-0	60.11	50.10	0.114	0.356	1.280	6.63	2.36	0.0002
M-40	Acetone	67-64-1	58.08	7.01	0.33	1.61	11.7	12.8	15.5	0.0003
M-40	Acrylonitrile	107-13-1	53.06	6.33	ND	ND	ND	ND	ND	0.02
M-40	Bromodichloromethane	75-27-4	163.83	3.13	0.003	0.01	ND	ND	ND	0.0002
M-40	Butane	106-97-8	58.12	5.03	4.87	3.3	37.9	ND	3.6	1
M-40	Carbon Disulfide	75-15-0	76.13	0.58	0.014	0.134	0.157	0.093	0.34	0.0002
M-40	Carbon Tetrachloride	56-23-5	153.84	0.004	0.00083	0.005	ND	0.038	ND	0.0005
M-40	Ethyl Mercaptan (Ethanediol)	75-08-1	62.13	2.28	ND	ND	ND	ND	ND	0.02
M-40	Carbonyl Sulfide (Carbon Oxysulfide)	463-58-1	60.07	0.49	ND	ND	ND	ND	ND	0.02
M-40	Chlorobenzene	108-90-7	112.56	0.25	0.195	0.229	0.833	0.021	0.135	0.0002
M-40	Chloroethane (Ethyl Chloride)	75-00-3	64.52	1.25	0.77	1.88	30.4	0.63	ND	0.0002
M-40	Chloroform	67-66-3	119.39	0.03	0.040	0.19	0.744	0.485	ND	0.0003
M-40	Chloromethane	74-87-3	50.49	1.21	0.012	0.072	1.26	0.232	ND	0.0001

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Method	Compound	CAS Number	Formula Weight	Concentration (ppmv)						
				Default Value	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E	Detection Limit
M-40	1,4-Dichlorobenzene	106-46-7	147.00	0.21	0.043	0.255	0.328	0.686	ND	0.0003
M-40	1,3-Dichlorobenzene	541-73-1	147.00	0.21	0.00047	0.00203	0.394	0.650	ND	0.0002
M-40	1,2-Dichlorobenzene	95-50-1	147.01	0.21	0.0019	0.0004	ND	0.031	ND	0.0003
M-40	Dichlorodifluoromethane (Freon 12)	75-71-8	120.91	15.70	0.118	0.468	1.60	1.24	0.232	0.0003
M-40	Dichlorofluoromethane (Freon 21)	75-43-4	102.92	2.62	ND	ND	ND	ND	ND	0.02
M-40	Methylene Chloride (Dichloromethane)	75-09-2	84.94	14.30	0.997	0.169	5.35	1.11	3.05	0.0001
M-40	Dimethyl Sulfide (Methyl Sulfide)	75-18-3	62.13	7.82	ND	ND	0.68	ND	ND	0.02
M-40	Ethane	74-84-0	30.07	889	6.2	4.6	14.3	5.6	13.5	1
M-40	Ethanol	64-17-5	46.08	27.20	0.020	0.202	0.172	0.394	0.0002	0.0002
M-40	Ethylbenzene	100-41-4	106.16	4.61	0.58	2.80	5.89	8.12	ND	0.0003
M-40	1,2-Dibromoethane (Ethylene dibromide)	106-93-4	187.88	0.001	0.001	0.007	0.021	ND	ND	0.0002
M-40	Trichloromonofluoromethane (Fluorotrichloromethane) (F11)	75-69-4	137.38	0.76	0.051	0.327	0.504	0.116	0.0082	0.0002
M-40	Hexane	110-54-3	86.18	6.57	ND	ND	4.94	3.98	0.597	0.0003
M-11	Hydrogen Sulfide	7783-06-4	34.08	35.50	13.1	22.9	55.5	72.7	322 J	NR
Methods 101A & 324	Mercury (Total)		215.63	253.0E-6	300.E-6	22.8E-6	51.2E-6	89.1E-6	163E-6	6.E-6
M-40	2-Butanone (Methyl Ethyl Ketone)	78-93-3	72.10	7.09	0.27	1.43	4.57	8.07	2.49	0.0003
M-40	2-Hexanone (Methyl Butyl Ketone)	591-78-6	100.16	1.87	0.557	0.441	ND	ND	ND	0.0002

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Method	Compound	CAS Number	Formula Weight	Concentration (ppmv)						
				Default Value	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E	Detection Limit
M-40	Methyl Mercaptan (Methanethiol)	74-93-1	48.11	2.49	ND	ND	ND	ND	ND	0.02
M-40	Pentane	109-66-0	72.15	3.29	3.20	2.60	26.6	2.37	1.30	1
M-40	Tetrachloroethylene (Perchloroethylene)	127-18-4	165.83	3.73	0.042	0.176	1.69	1.02	0.125	0.0003
M-40	Propane	74-98-6	44.09	11.10	8.9	5.9	40.0	30.5	13.0	1
M-40	t-1,2-Dichloroethene	156-60-5	96.94	2.84	0.003	0.009	0.042	0.053	ND	0.0003
M-40	Trichloroethylene (Trichloroethene)	79-01-6	131.38	2.82	0.028	0.103	0.515	0.418	0.094	0.0002
M-40	Vinyl Chloride	75-01-4	62.50	7.34	0.097	0.41	0.768	1.20	0.0634	0.0002
M-40	m/p-Xylene (Dimethyl Benzene)	1330-20-7	106.16	12.10	3.73	3.98	9.21	13.6	9.00	0.00065
M-40	o-Xylene (Dimethyl Benzene)	95-47-6	106.16	12.10	0.30	1.41	3.66	5.41	3.10	0.0003
M-40	Benzene (No-disposal or Unknown)	71-43-2	78.11	1.91	0.073	0.251	1.63	1.20	0.887	0.0002
M-25C	NMOC as Hexane (No-codisposal or Unknown)		86.17	595.00	373	355	5870	1006	233	NR
M-40	Toluene (Methyl Benzene) (No or Unknown)	108-88-3	92.13	39.30	1.33	6.77	23.3	30.3	7.95	0.0003

ND - Constituent not detected at the stated method detection limits

NR – Constituent detection limit not reported by laboratory

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6. Data Quality Assessment

Detailed assessments of this project's performance in terms of quality are included in the individual landfill test reports. With a few exceptions, the project was able to meet the Measurement Quality Objectives (MQOs) established in the QAPPs.

Table 6-1 shows a comprehensive overview of measurements that, for various reasons, did not meet the specified MQOs.

Table 6-1. Summary of Sampling and Analyses Exceptions

		Quality Assurance Observations				
Method	Measurement	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
EPA Method 1	Selection of traverse points	NI	NI	NI	NI	NI
EPA Method 2	Determination of stack gas velocity and volumetric flow rate	NI	NI	NI	NI	NI
EPA Method 3A	Determination of stack gas O ₂ and CO ₂ for stack gas molecular weight calculations	CEM calibration and drift check exceeded criteria slightly.	CEM calibration and drift check exceeded criteria slightly	NI	NI	NI
EPA Method 3C	Determination of CO ₂ , CH ₄ , N ₂ , and O ₂ in raw LFG	NI	NI	NI	NI	NI
EPA Method 4	Determination of stack gas moisture	NI	NI	NI	NI	NI
EPA Method 6C	Determination of stack gas SO ₂	CEM calibration and drift check exceeded criteria slightly.	Drift and system bias checks exceeded criteria	NI	NI	NI
EPA Method 7E	Determination of stack gas NO _x	CEM calibration and drift check exceeded criteria slightly.	Drift check exceeded criteria	NI	1 drift check was at 3.3%	NI
EPA Method 10	Determination of stack gas CO	NI	NI	NI	NI	NI
EPA Method 11	Determination of raw LFG H ₂ S	NI	NI	Exceeded hold time.	Exceeded hold time.	Did not do QAPP-specified spike. However method does not specify spike to be required. Data was flagged.

		Quality Assurance Observations				
Method	Measurement	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
EPA Method 23	Determination of LFG PAHs by Method 8270 PCBs by Method 1668	Extracts too concentrated for analysis. No data was produced	Extracts too concentrated for analysis. No data was produced	Not a specified measurement	Not a specified measurement	Not a specified measurement
EPA Method 23	Determination of stack gas dioxins/furans by Method 8290	1 of 3 samples analyzed. Did not meet 90% completion goal	Exceeded hold time. Detected some targets in blank. Data were notated. 1 of 3 samples analyzed. Did not meet 90% completion goal.	NI	Not a specified measurement	NI
EPA Method 23	Determination of stack gas PAHs by Method 8270	1 of 3 samples analyzed. Did not meet 90% completion goal	Exceeded hold time. Detected some targets in blank. Data were notated. 1 of 3 samples analyzed. Did not meet 90% completion goal.	Detected targets in blank. Data reported and flagged. Recovery of d ₁₂ -perylene was low Relevant data were flagged.	Not a specified measurement	Detected targets in blank. Data reported and flagged.
EPA Method 25A	Determination of flare stack gas NMOCs, as THCs	NI	Drift check exceeded criteria	NI	NI	NI

		Quality Assurance Observations				
Method	Measurement	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
EPA Method 25C	Determination of raw LFG NMOCs	Exceeded hold time. Detected 2 ppmv hexane in field blank.	Exceeded hold time. Detected 8.5 ppmv hexane in field blank.	NI	N ₂ and O ₂ exceeded threshold. Data flagged	Exceeded hold time Detected 3 ppmv hexane in field blank. 1 sample had N ₂ and O ₂ exceeded threshold.
EPA Method 26A	Determination of stack gas HCl	NI	NI	NI	NI	NI
EPA Method 29	Determination of stack gas metals	NI	NI	Nickel CCV at 10.6 and 14.0%	Nickel CCV at 10.6 and 14.0%	Nickel CCV at 10.6 and 12.2%
EPA Method 40/TO-15	Determination of raw LFG VOCs	Detected low concentrations of a few targets in field blank Spike recovery exceeded criteria for ethanol and m/p Xylene. RSD for hexane and isopropyl alcohol exceeded criteria. Affected data were flagged	Detected low concentrations of a few targets in field blank, Spike recovery for chlorobenzene exceeded criteria. RSD for Methylene chloride exceeded criteria. Affected data were flagged	Detected low concentrations of a few targets in field blank. Data were flagged.	Detected low concentrations of a few targets in field blank. Cyclohexane RSD 41.2% Heptane RSD 57.4% Data were flagged.	Detected low concentrations of a few targets in field blank. Ethanol spike recovery 2.4%, m/p-xylene recovery 230% Isopropyl alcohol RSD 56.3% Hexane RSD 40.7%
SW-846 Method 0100/TO-11	Determination of raw LFG carbonyls (formaldehyde, acetaldehyde)	Formaldehyde levels in samples are near the MDL. Results are flagged as estimates "J"	Detected 0.07µg formaldehyde in field blank	NI	NI	NI

		Quality Assurance Observations				
Method	Measurement	Landfill A	Landfill B	Landfill C	Landfill D	Landfill E
LUMEX instrument	Determination of raw LFG Hg ⁰	NI	NI	NI	NI	Sampled at compressor exit
Organic mercury methods (Frontier)	Determination of raw LFG monomethyl mercury.	Exceeded 14-day hold time RSD exceeded criteria	Exceeded 14-day hold time RSD exceeded criteria	Exceeded 14-day hold time. 1 of 6 samples was damaged.	NI	Exceeded 14-day hold time
Organic mercury methods (Frontier)	Determination of raw LFG dimethyl mercury	Exceeded 14-day hold time Spike recovery less than 40%. Data rejected.	Exceeded 14-day hold time Spike recovery less than 40%. Data rejected.	NI	NI	Exceeded 14-day hold time
Organic mercury methods (Frontier)	Determination of raw LFG total mercury.	Exceeded 14-day hold time	Exceeded 14-day hold time	Exceeded 14-day hold time	Exceeded 14-day hold time	Exceeded 14-day hold time
Organic mercury methods (Geochimica)	Determination of raw LFG monomethyl mercury.	Not a specified measurement	Not a specified measurement	Not a specified measurement	Not a specified measurement	NI
Organic mercury methods (Geochimica)	Determination of raw LFG dimethyl mercury	Not a specified measurement	Not a specified measurement	Not a specified measurement	Not a specified measurement	NI
Organic mercury methods (Geochimica)	Determination of raw LFG total mercury.	Not a specified measurement	Not a specified measurement	Not a specified measurement	Not a specified measurement	NI

NI – No issues or QA exceptions

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7. Conclusions

The test data collected during this test program provides updated information concerning the constituents in landfill gas and combustion by-products from five MSW landfills. Ideally, it would be preferable to have collected data from a wider range of landfills covering different gas control technology, geographic areas, landfill size and age, and variations in waste composition. The data are considered useful in providing a detailed and comprehensive set of data. It also helps in evaluating how representative data are that have been supplied by industry, state and local regulatory authorities, and others.

The average concentrations of constituents in landfill gas for the five landfills were half or lower of their corresponding AP-42 values. For sixteen constituents, at least one landfill had an average concentration greater than the existing AP-42 value. The details of the sampling at each site are provided in the appendices to this report.

Limitations in the data include lack of data from a wider range of combustion technology. Also, the field test measurements did not include wet or bioreactor landfills. Not clear if there will be an increase in air toxics resulting from increased levels of metals due to leachate recirculation and addition of sewage sludge or other liquid additions. Also, this study did not include turbines since they are not as widely used as boilers, IC engines, and flares. With increasing use of micro-turbines, it would be helpful to have data on combustion by-product emissions to compare to other technologies in use.

With respect to project QA, while a few of the measurements presented some challenges, the project succeeded in producing a comprehensive data set. Therefore, this project met its data quality objective of *“performing tests by using EPA reference test methods, or when not applicable, sound methodology and that tests are reported in enough detail for adequate validation and raw data are provided that can be used to duplicate the emission results presented in the report.”*

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Field Test Measurements at Five Municipal Solid Waste Landfills with Landfill Gas Control Technology

Appendix A SOURCE TEST REPORT FOR LANDFILL A

This report presents the results of a field test conducted at Landfill A that is located in the northeastern U.S. Testing took place on November 1 and 2, 2002.

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- C. Method 3C (O₂, N₂, CH₄, CO₂)
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- E. Organic mercury Method (Mercury, Total, Monomethyl, Dimethyl)
- F. LUMEX (Elemental Mercury)
- G. Hydrogen Sulfide
- H. Continuous Emission Monitor (Data and Charts)
- I. Method 23 (PAH)
- J. Method 23 (PCDD/PCDF)
- K. Method 23 (PAH, PCDD/PCDF)
- L. Method 29 (Metals)
- M. Method 26A (HCl)
- P. Raw Field Data Records
- Q. CEM Calibration Records and Span Gas Certification
- R. Sampling Control Meter Boxes Calibration Record

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Acronym List

%D	Percent drift
AP-42	Compilation of Air Pollutant Emission Factors
APPCD	Air Pollution Prevention Control Division
ARCADIS	ARCADIS G&M, Inc.
As	Arsenic
AS	Alternative standard
CCVs	Continuing calibration verification samples
Cd	Cadmium
CEMS	Continuous emission monitoring system
CH ₄	Methane
Cl ₂	Chlorine
CO	Carbon monoxide
CO ₂	Carbon dioxide
Cr	Chromium
DMHg	Dimethyl mercury
EPA	US Environmental Protection Agency
ES	Extraction standard
FID	Flame ionization detector
GC	Gas chromatograph
GC/FID	Gas chromatograph/flame ionization detector
GC/MS	Gas chromatograph/mass spectrometer
HCl	Hydrogen chloride
Hg	Mercury
H ₂ S	Hydrogen sulfide
IC	Internal combustion
ICVs	Internal calibration verification samples
LFG	Landfill gas
MDL	Method Detection Limit

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MMHg	Monomethyl mercury
Mn	Manganese
MQOs	Measurement quality objectives
MSW	Municipal solid waste
N ₂	Nitrogen
Ni	Nickel
NMOCs	Non-methane organic compounds
NO _x	Nitrogen oxides
O ₂	Oxygen
PAHs	Polynuclear aromatic hydrocarbons
Pb	Lead
PCBs	Polychlorinated biphenyls
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality control
RF	Response factor
RPD	Relative percent difference
RRF	Relative response factors
RSD	Relative standard deviation
RTP	Research Triangle Park
SO ₂	Sulfur dioxide
SS	Sampling standards
TCDD/TCDFs	Dioxins/furans
THCs	Total hydrocarbons
TICs	Tentatively identified compounds
TSR	Technical system review
VOCs	Volatile organic compounds
WC	Water column

1. Introduction

Large municipal solid waste landfills are subject to Clean Air Act regulations because of concerns related to their emissions and their potential adverse effects to human health and the environment. Landfills are listed as a source of air toxics in the Urban Air Toxics Strategy for future evaluation of residual risk. Existing emission factors for landfill gas (LFG) were largely developed using data from the 1980s and early 1990s. A database was developed summarizing data from approximately 1,200 landfills, along with emissions information from the literature, and test reports prepared by state and local government agencies and industry. These data were summarized in *Compilation of Air Pollutant Emission Factors (AP-42)*, Chapter 2.4. The final rule and guidelines are contained in 40 CFR Parts 51, 52, and 60, *Standards of Performance for New Stationary Sources and Guidelines for Control of Existing Sources: Municipal Solid Waste Landfills*.

The overall purpose of this testing program was to generate data that may be used to update AP-42 and include data that reflect current waste management operating practices.

This report presents the results of a field test conducted at Landfill A that is located in the northeastern U.S. Testing took place on November 1 and 2, 2002.

The site uses four internal combustion engine/electric generator sets to reclaim the energy content in the LFG. A standby enclosed flare is used for the destruction of any excess LFG. A more detailed description of the engine system is presented in Section 2. The specific purpose of the testing program was to determine the concentrations of constituents in the raw LFG and emissions from the stack of one of the engines. The constituents of interest in the raw LFG were volatile organic compounds (VOCs), non-methane organic compounds (NMOCs), hydrogen sulfide (H₂S), carbonyls (acetaldehyde and formaldehyde), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and mercury (Hg) compounds. The pollutants of interest for the treated LFG, in this case at the engine stack, were carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), NMOCs as total hydrocarbons (THCs), hydrogen chloride (HCl), dioxins/furans (PCDD/PCDFs), PAHs, total Hg, and metals.

ARCADIS G&M, Inc. (ARCADIS), as contractor to the US Environmental Protection Agency's (EPA) Air Pollution Prevention Control Division (APPCD), performed this work under Work Assignment 4-1 of the Onsite Laboratory Support Contract (68-C-

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99-201). The testing activities followed the specifications of the approved “*Site-Specific Quality Assurance Project Plan for the Field Evaluations of Landfill Gas Control Technologies - Landfill A*”. This report was prepared under Work Assignment 2-26 of the continuing Onsite Laboratory Support Contract (EP-C-04-023).

2. Landfill Facility Descriptions

Available information indicated that the site began operation in 1972. By 2003, Landfill A had 2,700,000 tons of waste placed over an area of 56 acres. The landfill used 3,375 feet of horizontal collectors to collect the LFG. The gases generated in the landfill were extracted with 29 vertical wells. The collected LFG was piped to the engine and enclosed flare system where it was combusted.

2.1 Landfill Gas (LFG) Destruction Process Description and Operation

Figure 2-1 shows a simplified process schematic of the engine and flare system at Landfill A. The landfill utilizes a bank of four engine generator sets for destruction of LFG and generation of electricity. The engines are Caterpillar 3412 four-stroke internal combustion (IC) engines, adapted for LFG. The Caterpillar 3412 is a spark-ignited V-12 engine with displacement of 1649 cubic inches. The engine is turbocharged and after-cooled, and has a cylinder bore diameter of 5.4 inches and a stroke of 6.0 inches. Engine #2 was tested and was connected to a Caterpillar SR4 Generator that is rated at 470KW.

2.2 Control Equipment Description

The engines did not have pollution control equipment installed.

2.3 Excess Landfill Gas (LFG) Flare

A Perennial Energy Enclosed Ground Flare Station, rated at maximum LFG input rate of 1500 scfm, received and destroyed excess LFG not needed by the four engines. The enclosed flare was not part of the test program. Measurement of emissions from the landfill flare system was the focus of testing at two other landfills, as an integral part of the research program.

A condensate removal system prevents liquids from entering into the engine and flare burners. A flame arrestor prevents flame from propagating from the burner array back into the LFG collection and flow control system.

2.4 Sampling Locations

Gas sampling was conducted at the raw LFG pipe that fed the engines and flare, and at Engine #2 stack, as depicted in Figure 2-1.

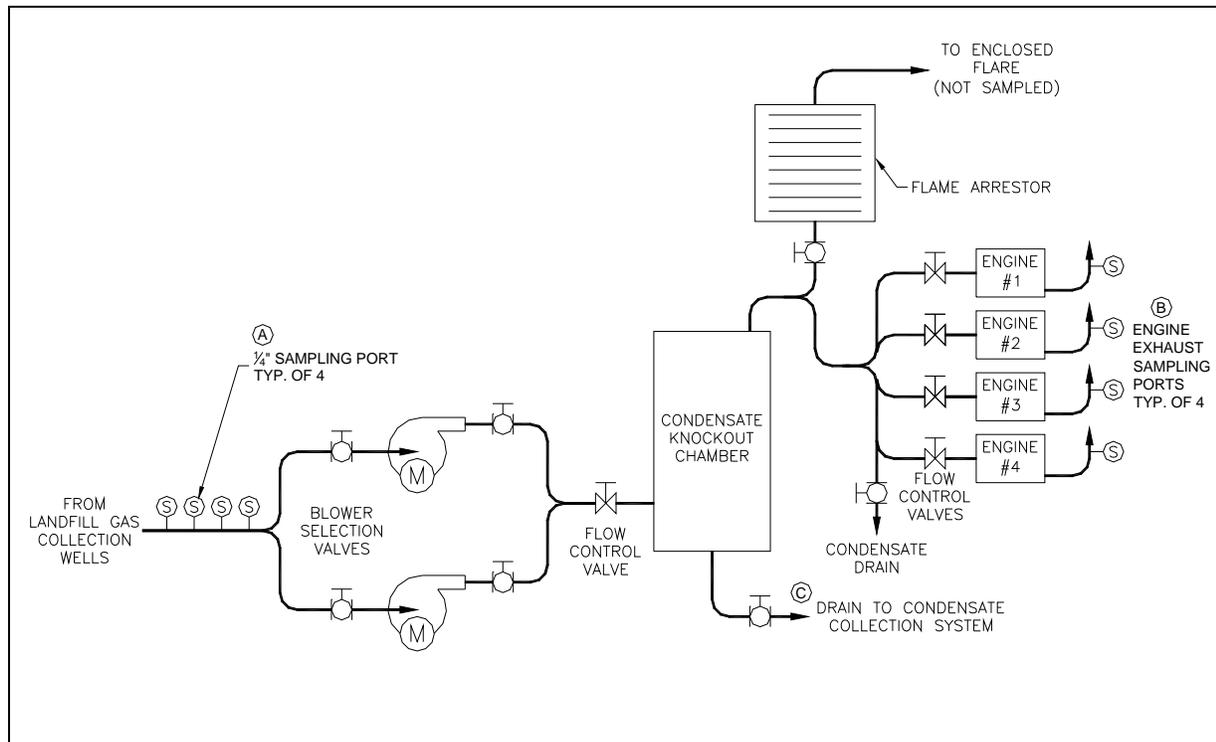


Figure 2-1. Simplified Engine and Flare Process Flow Diagram and Sampling Points

2.4.1 Raw Landfill Gas (LFG) Header Pipe

Raw LFG samples were collected from the header pipe as it emerged from the ground and upstream of any processing units. Figure 2-2 shows the raw LFG inlet pipe. The pipe was 12 inches in diameter as it emerged vertically from the ground and turned 90 degrees to run horizontally towards the LFG control-and-process system. At the sampling point, which was about 8 feet after the bend, four 1/4" gas taps were installed on the top of the horizontal pipe, at approximately 6-inch spacing. Through these ports, gases were withdrawn to obtain the test samples.

Comparing the physical arrangement of this header pipe with requirements of standard sampling methodologies indicated that the header configuration rendered isokinetic sampling at the gas collection pipe impossible. Therefore, isokinetic sampling was not attempted at this location. Further discussions on this topic are presented in Section 3.3.1.1.



Figure 2-2. Landfill Gas Collection Pipe

2.4.2 Engine #2 Stack

Engine #2 is shown in Figure 2-3. The exhaust gas of the engine was ducted outside of the engine room via a pipe. The engine stack is 8.25 inches in diameter and has two 4-inch sampling ports installed 90 degrees apart. Figure 2-4 is a schematic of the engine stack and includes the locations of the sample traverse points. Isokinetic sampling was possible at this location and was followed.



Figure 2-3. Engine/Generator Set #2

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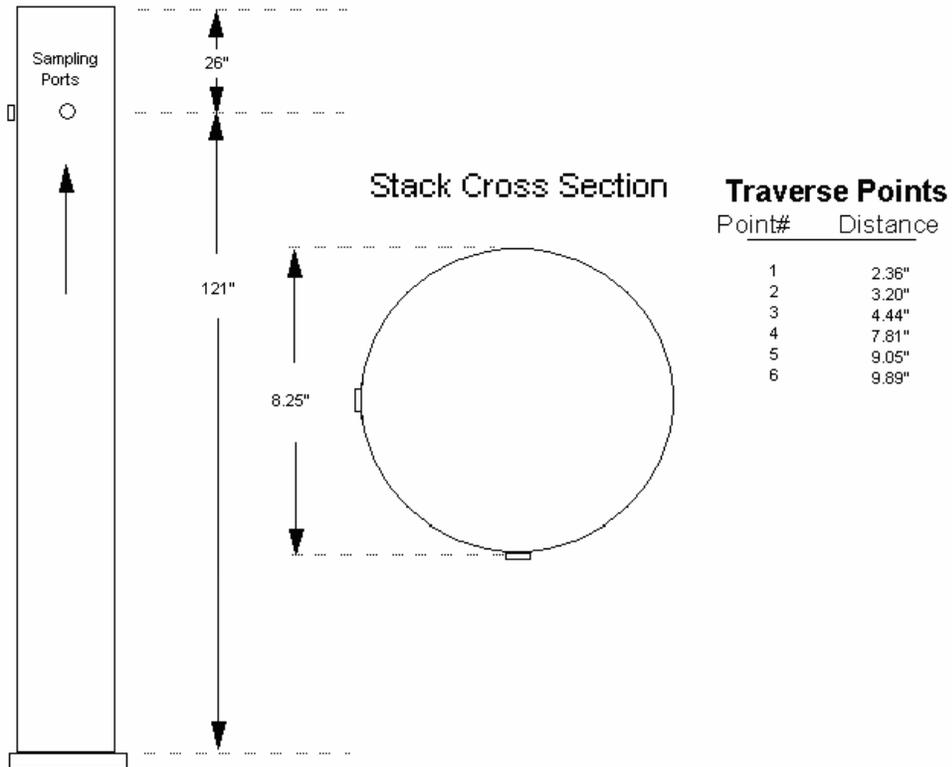


Figure 2-4. Engine Stack Dimension and Sampling Traverse Locations

3. Test Operations

As stated previously, the purpose of the sampling program was to determine the concentrations of the target analytes in the raw LFG at the header pipe and emissions from the engine stack.

3.1 Test Team

The tests were conducted by a team of seven individuals. In addition, ARCADIS' Quality Assurance (QA) Officer conducted an internal technical system review (TSR) during this test. The Work Assignment Leader provided general oversight. The team members and their primary duties are listed in Table 3-1.

Table 3-1. ARCADIS Test Team Members and Responsibilities

Role	Primary Duty
Test Engineer	Chief
Technician	CEM operator
Technician	Sample train preparation and recovery
Technician	Sample train operator at raw LFG inlet pipe
Test engineer	Sample train operator at stack
Technician	Sample train operator at stack
Test engineer	Mercury measurements
Quality Assurance Officer	QA Technical Systems Review (Internal)
Work Assignment Leader	Observer and general over-sight

3.2 Test Log

3.2.1 Planned Test Sample Matrices

The list of target samples to be collected and measurements to be conducted are specified in the Quality Assurance Project Plan (QAPP) dated October 29 2002. These are reiterated here for completeness. Table 3-2 lists the target compounds of interest for the raw LFG samples. Table 3-3 lists the target compounds of interest for the treated gas, collected from the engine stack.

Table 3-2. Target Analytes for the Raw Landfill Gas and Sample Condensate Collected at the Gas Header

Volatile compounds	Volatile compounds (continued)	Carbonyls
Methane	Ethylene dibromide	Acetaldehyde
Ethane	Ethylene dichloride	Formaldehyde
Propane	Methyl chloroform	
Butane	Methyl isobutyl ketone	Polycyclic aromatic hydrocarbons
Pentane	Methylene chloride	
Hexane	Propylene dichloride	Polychlorinated biphenyls
Carbonyl sulfide	t-1,2-Dichloroethene	
Chlorodifluoromethane	Tetrachloroethene	Mercury
Chloromethane	Toluene	Organo-mercury compounds
Dichlorodifluoromethane	Trichlorethylene	Total
Dichlorofluoromethane	Vinyl chloride	Elemental
Ethyl chloride	Vinylidene chloride	
Fluorotrichloromethane	Ethanol	Gases
1,3-Butadiene	Methyl ethyl ketone	Carbon dioxide
Acetone	2-Propanol	Oxygen
Acrylonitrile	1,4-Dichlorobenzene	
Benzene	Ethylbenzene	Moisture
Bromodichloromethane	Xylenes	
Carbon disulfide		
Carbon tetrachloride		
Chlorobenzene	Non-methane organic carbons	
Chloroform		
Dimethyl sulfide	Reduced sulfur compounds	
Ethyl mercaptan	Hydrogen sulfide	

Table 3-3. Target Analytes for the Engine Stack Gas Stream

Gases	Dioxins/Furans (PCDD/PCDFs)
Oxygen	
Carbon dioxide	Polycyclic Aromatic Hydrocarbons (PAHs)
Carbon monoxide	
Nitrogen oxide	Mercury
Sulfur dioxide	Total
Total hydrocarbons	
Non-methane organic compounds	Metals
	Lead, arsenic, cadmium, chromium, manganese, nickel
Hydrogen chloride	

3.2.2 Raw Landfill Gas (LFG) (Inlet)

Sample collection took two days to complete. Figure 3-1 shows the sampling team in action at this sample location. Table 3-4 lists the samples that were collected from the raw LFG pipe.



Figure 3-1. Sampling Operations at the Raw Landfill Gas Inlet

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Table 3-4. Raw Landfill Gas Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 40 (TO-15, 25C, 3C)					
	A-Pre-M40-110202-01	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	11/02/02	10:30 - 10:58
	A-Pre-M40-110202-02	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	11/02/02	11:40 - 12:18
	A-Pre-M40-110202-03	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	11/02/02	12:37 - 13:09
EPA Method 23					
	A-Pre-M23-110102-01	PAHs, PCBs	Test	11/01/02	11:05 - 14:08
	A-Pre-M23-110102-02	PAHs, PCBs	Test	11/01/02	11:05 - 14:05
	A-Pre-M23-110102-03	PAHs, PCBs	Test	11/01/02	15:46 - 18:46
EPA Method 0100					
	A-Pre-M0100-110202-01	Carbonyls	Test	11/02/02	11:23 - 11:53
	A-Pre-M0100-110202-02	Carbonyls	Test	11/02/02	12:10 - 12:40
	A-Pre-M0100-110202-03	Carbonyls	Test	11/02/02	13:03 - 13:33
EPA Method 11					
	A-Pre-M0011-110202-01	H ₂ S	Test	11/02/02	14:33 - 14:43
	A-Pre-M0011-110202-02	H ₂ S	Test	11/02/02	15:40 - 15:50
	A-Pre-M0011-110202-03	H ₂ S	Test	11/02/02	16:25 - 16:35
Lumex Instrument					
	A-Pre-EM-110202-01	Elemental Hg ^a	Test	11/02/02	14:49 - 16:00
	A-Pre-EM-110202-02	Elemental Hg ^a	Test	11/02/02	14:49 - 16:00
	A-Pre-EM-110202-03	Elemental Hg ^a	Test	11/02/02	14:49 - 16:00
Frontier					
	A-Pre-TGM-110102-FB01	Total gaseous Hg	Field Blank	11/01/02	14:45
	A-Pre-TGM-110102-01	Total gaseous Hg	Test	11/01/02	11:20 - 11:55
	A-Pre-TGM-110102-02	Total gaseous Hg	Test	11/01/02	12:26 - 13:03
	A-Pre-TGM-110102-03	Total gaseous Hg	Test	11/01/02	13:49 - 14:23
Frontier					
	A-Pre-MMM-110202-SP01	Monomethyl Hg	Spike	11/02/02	15:50 - 14:24
	A-Pre-MMM-110202-FB01	Monomethyl Hg	Field Blank	11/02/02	13:30 - 13:35
	A-Pre-MMM-110202-01	Monomethyl Hg	Test	11/02/02	10:15 - 10:44

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
	A-Pre-MMM-110202-02	Monomethyl Hg	Test	11/02/02	11:08 - 11:40
	A-Pre-MMM-110202-03	Monomethyl Hg	Test	11/02/02	12:13 - 12:45
Frontier					
	A-Pre-DMM-110202-SP01	Dimethyl Hg	Spike	11/02/02	08:46 - 09:12
	A-Pre-DMM-110202-FB01	Dimethyl Hg	Field Blank	11/02/02	08:10 - 08:15
	A-Pre-DMM-110202-01	Dimethyl Hg	Test	11/02/02	15:19 - 15:44
	A-Pre-DMM-110202-02	Dimethyl Hg	Test	11/02/02	16:31 - 17:00
	A-Pre-DMM-110202-03	Dimethyl Hg	Test	11/02/02	17:26 - 17:55

^a Represents average of 3 readings, each of 30-second duration

3.2.3 Engine Stack

Sampling at the engine stack was conducted by accessing the sampling ports with the aid of a scaffold. Figure 3-2 shows the engine and the sampling scaffold platform.

The engine stack was sampled for NMOCs (as THC_s), PCDDs/PCDFs, PAHs, HCl, lead (Pb), arsenic (As), cadmium (Cd), chromium (Cr), manganese (Mn), nickel (Ni), total Hg, SO₂, NO_x, CO, carbon dioxide (CO₂), and oxygen (O₂). Table 3-5 lists the test samples that were collected from the engine stack.

The engine stack cross-section was divided into 6 equal areas according to EPA Method 1. Sampling at the engine stack was conducted at isokinetic conditions. Sample collection times for the Method 26 HCl train and the Method 29 metals train were 60-minutes. Run time for the Method 23 PCDDs/PCDFs trains was 180 minutes. Run time for continuous emission monitoring system (CEMS) parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) varied.



Figure 3-2. Engine #2 Stack and Sampling Scaffold

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Table 3-5. Engine Stack Test Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 3A (CEM)					
	A-Post-M3A-110102-01	O ₂	Test	11/01/02	12:03 - 14:50
	A-Post-M3A-110102-02	O ₂	Test	11/01/02	16:42 - 19:00
	A-Post-M3A-110202-03	O ₂	Test	11/02/02	09:50 - 15:20
EPA Method 3A (CEM)					
	A-Post-M3A-110102-01	CO ₂	Test	11/01/02	12:03 - 14:50
	A-Post-M3A-110102-02	CO ₂	Test	11/01/02	16:42 - 19:00
	A-Post-M3A-110202-03	CO ₂	Test	11/02/02	09:50 - 15:20
EPA Method 10 (CEM)					
	A-Post-M10-110102-01	CO	Test	11/01/02	12:03 - 14:50
	A-Post-M10-110102-02	CO	Test	11/01/02	16:42 - 19:00
	A-Post-M10-110202-03	CO	Test	11/02/02	09:50 - 15:20
EPA Method 7E (CEM)					
	A-Post-M7E-110102-01	NO _x	Test	11/01/02	12:03 - 14:50
	A-Post-M7E-110102-02	NO _x	Test	11/01/02	16:42 - 19:00
	A-Post-M7E-110202-03	NO _x	Test	11/02/02	09:50 - 15:20
EPA Method 6C (CEM)					
	A-Post-M6C-110102-01	SO ₂	Test	11/01/02	12:03 - 14:50
	A-Post-M6C-110102-02	SO ₂	Test	11/01/02	16:42 - 19:00
	A-Post-M6C-110202-03	SO ₂	Test	11/02/02	09:50 - 15:20
EPA Method 25A (CEM)					
	A-Post-M25A-110102-01	NMOCs (THC)	Test	11/01/02	12:03 - 14:50
	A-Post-M25A-110102-02	NMOCs (THC)	Test	11/01/02	16:42 - 19:00
	A-Post-M25A-110202-03	NMOCs (THC)	Test	11/02/02	09:50 - 15:20
Lumex Instrument					
	A-Post-EM-110202-01	Elemental Hg ^a	Test	11/02/02	14:49 - 16:00
	A-Post-EM-110202-02	Elemental Hg ^a	Test	11/02/02	14:49 - 16:00

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 26					
	A-Post-M26-110102-01	HCl	Test	11/01/02	15:32 - 16:57
	A-Post-M26-110102-02	HCl	Test	11/01/02	15:34 - 16:59
	A-Post-M26-110202-03	HCl	Test	11/02/02	13:10 - 14:17
EPA Method 23					
	A-Post-M23-110102-01	Dioxins/furans, PAHs	Test	11/01/02	11:09 - 13:30
	A-Post-M23-110102-02	Dioxins/furans, PAHs	Test	11/01/02	11:12 - 14:33
	A-Post-M23-110202-03	Dioxins/furans, PAHs	Test	11/02/02	09:01 - 12:14
EPA Method 29					
	A-Post-M29-110102-01	Metals	Test	11/01/02	17:42 - 18:55
	A-Post-M29-110102-02	Metals	Test	11/01/02	17:44 - 18:57
	A-Post-M29-110202-03	Metals	Test	11/02/02	13:13 - 14:21

^a Represents 3 readings, each 30 seconds in duration

3.3 Field Test Changes and Deviations from QAPP Specifications

3.3.1 Variation from Test Methods and/or Planned Activities

3.3.1.1 Sampling at the Raw Landfill Gas (LFG) Pipe

Because of the configuration of the raw LFG inlet pipe, isokinetic sampling at this location was not possible and hence was not attempted. The gas collection pipe is 12 inches in diameter (see Figure 2-2). Isokinetic sampling requires a 4-inch port to accommodate the sampling probe. During the pre-test site survey, facility could only install ¼-inch sampling ports on the gas pipe because of safety concerns. Therefore, collecting the samples isokinetically was not possible.

Isokinetic sampling would be of value if collecting particulate samples were needed. Little particulate matter was expected in the raw LFG pipe and this speculation was corroborated by the observation that the glass fiber filters on several of the sampling trains did not reveal the presence of particulates.

3.3.1.2 Landfill Gas (LFG) Inlet Pipe Condensate Sample

The facility used a condensate knock-out vessel to separate the condensate from the gas stream. During these tests, the condensate drain valve was in the “closed” position. According to the site operator, that was the typical operation configuration for the unit. There were not provisions to withdraw a condensate sample from the knock-out vessel. However, the pipe that delivers the raw LFG to the engines runs along the outside of the engine room. A condensate drain pipe with a valve was in place. A sample of the condensate was collected at that location and placed in archive storage so that it would be available if analysis were deemed necessary. The condensate sample was not analyzed.

3.3.1.3 Landfill Gas (LFG) Flow Rate Measurement

Gas flow as indicated by the LFG flow control station was recorded. However, the accuracy of these measurements could not be verified because of the inability to measure gas velocity accurately. The test team was able to make crude velocity measurements by inserting a velocity probe part-way into the gas pipe. The accuracies of these measurements are uncertain, even though they appear to agree with the facility’s flow control station readings.

3.3.2 Application of Test Methods

The sampling and, where applicable, analytical methods used in this test program follow those specified in the QAPP. Table 3-6 lists the applicable measurement and analysis methods and their corresponding performing organizations.

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Table 3-6. Test Methods and Performing Organizations

Procedure	Description	Organization Performing Analysis
EPA Method 1	Selection of traverse points	ARCADIS G&M
EPA Method 2	Determination of stack gas velocity and volumetric flow rate	ARCADIS G&M
EPA Method 3A	Determination of stack gas O ₂ and CO ₂ for flare stack gas molecular weight calculations	ARCADIS G&M
EPA Method 3C	Determination of CO ₂ , CH ₄ , N ₂ , and O ₂ in raw LFG	Triangle Environmental Services
EPA Method 4	Determination of stack gas moisture	ARCADIS G&M
EPA Method 6C	Determination of stack gas SO ₂	ARCADIS G&M
EPA Method 7E	Determination of stack gas NO _x	ARCADIS G&M
EPA Method 10	Determination of stack gas CO	ARCADIS G&M
EPA Method 11	Determination of raw LFG H ₂ S	Oxford Laboratories
EPA Method 23	Determination of stack gas Dioxins/furans by Method 8290 PAHs by Method 8270 PCBs by Method 1668	ALTA Analytical Perspectives
EPA Method 25A	Determination of flare stack gas NMOCs, as THCs when total organic concentration is less than the 50 ppm Method 25C applicability threshold	ARCADIS G&M
EPA Method 25C	Determination of raw LFG NMOCs	Triangle Environmental Services
EPA Method 26A	Determination of stack gas HCl	Resolution Analytics
EPA Method 29	Determination of stack gas metals	First Analytical Laboratories
EPA Method 40/TO-15	Determination of raw LFG VOCs	Research Triangle Park Laboratories
SW-846 Method 0100/TO-11	Determination of raw LFG carbonyls (formaldehyde, acetaldehyde)	Resolution Analytics
LUMEX instrument	Determination of raw LFG Hg ⁰	ARCADIS G&M
Organic mercury methods	Determination of raw LFG: Methyl mercury Dimethyl mercury Total mercury.	Frontier Geosciences

3.3.3 Test Method Exceptions

Laboratory analytical procedures followed those prescribed by the specified methods, with the following exceptions:

Raw LFG

- Carbonyls were analyzed by Method TO-11 instead of SW-846 Method 8315. (Method TO-11 and Method 8315 closely resemble each other.)
- Polycyclic aromatic hydrocarbons (PAHs) were analyzed by SW-846 Method 8270 as specified in the QAPP. However, the sample extracts were found to contain excessive amounts of non-PAH organics. In order to make the extracts safe to be injected into the gas chromatograph/mass spectrometer (GC/MS), samples had to be diluted excessively. The high dilution made the method detection levels for the target PAHs too high, resulting in “non-detects” at the high detection limits. The planned analysis method could not produce the desired results at the needed detection levels. At the time of report writing, alternative analysis method had not been identified. The sample extracts are in storage and may be submitted for analysis if a suitable method becomes available.
- Polychlorinated biphenyls (PCBs) were analyzed by EPA Method 1668 (EPA 812/R-97-001) as specified in the QAPP. However, similar to the difficulties experienced for the PAH analysis, in order to make the extracts safe to be injected into the gas chromatograph (GC), they had to be diluted excessively. The planned analysis method could not produce the desired results at the needed detection levels.
- For raw LFG inlet samples, VOCs were analyzed by EPA Method TO-15. Methane (CH₄) was analyzed by GC/FID and additionally by Method 3C.

Engine Stack

- Non-methane organic compounds (NMOCs) - Method 25A was used instead of the specifically applicable Method 25C.

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4. Presentation of Test Results

Testing took place at Landfill A on November 1-2, 2002. Results of the testing are presented in this section. Detailed test results are included in the Appendices for close examination by the reader. The following subsections provide concise summaries of the test results.

4.1 Raw Landfill Gas (LFG) Results

As depicted in Figure 2-2, sampling was conducted by extracting samples from the four ¼-inch ports installed in the raw LFG pipe.

4.1.1 Raw Landfill Gas (LFG) Flow Rate and Temperature

4.1.1.1 Direct Measurements

The facility process system has a flow measurement system that displays the flow rate on an instrument panel meter. The panel meter read between 1650 and 1700 scfm.

The small size of the sampling ports precluded the proper measurement of the velocity profile all the way across the gas pipe. Nonetheless, measurements with a velocity probe ranged from 1935 ft/min to 2075 ft/min. At these velocities, and with pipe inside diameter of 12 inches, the volumetric flow rate was estimated to be about 1580 cu ft/min. Vacuum at the raw LFG pipe was 34 to 35 inch water column (WC).

A direct measurement with thermocouples showed the raw LFG temperature was 57°F.

4.1.1.2 Landfill Gas (LFG) Flow Rate Combined Estimate

The raw LFG flow rate was based on two independent measurements: 1650 to 1700 scfm by the facility's flow rate indicator and 1580 scfm by the crude pitot probe measurement. This resulted in an estimated average of 1640 scfm.

4.1.2 Raw Landfill Gas (LFG) Constituents

The concentrations of the constituents of interest in the raw LFG are presented in the following Subsections 4.1.2.1 through 4.1.2.5. Following the presentation of the constituent concentrations, Section 4.3 summarizes the data and presents a comparison

with the AP-42 default emission concentration values. The section also presents the estimated mass flow rates of the constituents at the raw LFG pipe.

In computing averages, when all measurements are “non-detect” (ND), the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50 percent of the stated method detection limit (MDL). If MDL is not reported, a ND measurement is treated as zero.

4.1.2.1 Volatile Organic Compounds (VOCs)

Concentrations of VOCs were obtained by collecting summa canister samples using Method 40 procedures. Analysis was performed by Method TO-15, with gas chromatography and mass spectrometry (GC/MS). The alkanes (C2 through C6), being present in much higher concentrations, were analyzed by GC flame ionization detection (FID) on the same summa canister samples.

Table 4-1 lists the results of these analyses. Tentatively identified compounds (TICs) can be seen in the Research Triangle Park (RTP) Laboratory reports in Appendix A.

Table 4-1. Raw Landfill Gas VOC Concentrations

Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
<u>By GC/FID</u>						
Ethane	ppmv	1	5.9	6.5	6.1	6.2
Propane	ppmv	1	8.5	9.0	9.3	8.9
Butane	ppmv	1	4.4	4.7	5.5	4.9
Pentane	ppmv	1	3.2	2.7	3.7	3.2
Hexane	ppmv	1	ND	ND	ND	ND
<u>By TO-15 GC/MS</u>						
Dichlorodifluoromethane (Freon 12)	ppbv	0.2	126	132	96	118
1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	ppbv	0.2	8.2	8.0	7.1	7.8
Chloromethane	ppbv	0.2	ND	36	ND	12
Vinyl chloride	ppbv	0.2	101	103	87	97
1,3-Butadiene (Vinylethylene)	ppbv	0.2	24	22	20	22

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
Bromomethane (Methyl Bromide) ^c	ppbv	0.2	5.7	5.7	35.6	15.6
Chloroethane (Ethyl Chloride)	ppbv	0.2	951	1100	256	770
Trichloromonofluoromethane (CFC11)	ppbv	0.2	60	51	43	51
1,1-Dichloroethene	ppbv	0.2	1.7	1.7	1.6	1.7
1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	ppbv	0.2	2.2	2.1	1.8	2.0
Carbon Disulfide	ppbv	0.2	15.9	11.8	15.6	14.4
Ethanol ^d	ppbv	0.2	23.4 J	20.1 J	15.7 J	19.7 J
Isopropyl Alcohol (2-Propanol) ^e	ppbv	0.2	145 J	160 J	36.1 J	114 J
Methylene chloride (Dichloromethane) ^c	ppbv	0.2	871	1070	1050	997
Acetone ^c	ppbv	0.2	381	325	278	328
t-1,2-dichloroethene	ppbv	0.2	2.9	2.6	2.6	2.7
Hexane ^e	ppbv	0.2	2270 J	2370 J	2780 J	2470 J
Methyl-t-butyl ether (MTBE)	ppbv	0.2	60.6	52.4	50.2	54.4
1,1-Dichloroethane	ppbv	0.2	17.8	57.0	25.5	33.4
Vinyl Acetate	ppbv	0.2	435	265	27	242
cis-1,2-Dichloroethene	ppbv	0.2	79.9	69.7	72.7	74.1
Cyclohexane	ppbv	0.2	177	167	151	165
Chloroform	ppbv	0.2	44.0	36.6	38.7	39.8
Ethyl Acetate	ppbv	0.2	ND	2670	2810	1830
Carbon Tetrachloride	ppbv	0.2	1.3	1.1	ND	0.8
Tetrahydrofuran (Diethylene Oxide)	ppbv	0.2	980	1070	1510	1180
1,1,1-Trichloroethane	ppbv	0.2	5.6	4.9	4.3	4.9
2-Butanone (Methyl Ethyl Ketone)	ppbv	0.2	289	249	281	273
Heptane	ppbv	0.2	262	238	225	242
Benzene	ppbv	0.2	79.3	70.2	69.6	73.0
1,2-Dichloroethane	ppbv	0.2	1.1	0.9	1.1	1.0
Trichloroethylene (Trichloroethene)	ppbv	0.2	31.1	26.2	26.6	28.0

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
1,2-Dichloropropane	ppbv	0.2	0.8	0.7	0.8	0.8
Bromodichloromethane	ppbv	0.2	3.6	2.2	2.1	2.6
1,4-Dioxane (1,4-Diethylene Dioxide)	ppbv	0.2	3.1	2.6	ND	1.9
cis-1,3-Dichloropropene	ppbv	0.2	ND	ND	0.5	0.2
Toluene (Methyl Benzene)	ppbv	0.2	680	1620	1670	1330
4-Methyl-2-pentanone (MIBK)	ppbv	0.2	1250	1320	650	1070
t-1,3-Dichloropropene	ppbv	0.2	0.6	0.2	ND	0.3
Tetrachloroethylene (Perchloroethylene)	ppbv	0.2	45.1	40.0	41.1	42.1
1,1,2-Trichloroethane	ppbv	0.2	7.5	7.5	7.9	7.6
Dibromochloromethane	ppbv	0.2	ND	ND	ND	ND
1,2-Dibromoethane (Ethylene dibromide)	ppbv	0.2	0.8	0.7	1.7	1.1
2-Hexanone (Methyl Butyl Ketone)	ppbv	0.2	380	494	796	557
Ethylbenzene	ppbv	0.2	612	545	570	575
Chlorobenzene	ppbv	0.2	74.4	64.8	445	195
m/p-Xylene (Dimethyl Benzene) ^d	ppbv	0.2	3200 J	3540 J	4450 J	3730 J
o-Xylene (Dimethyl Benzene)	ppbv	0.2	312	290	298	300
Styrene (Vinylbenzene)	ppbv	0.2	41.5	38.2	8.8	29.5
Tribromomethane (Bromoform)	ppbv	0.2	1.1	ND	ND	0.4
1,1,1,2-Tetrachloroethane	ppbv	0.2	49.1	ND	40.4	29.9
1-Ethyl-4-methylbenzene ^b (4-Ethyl Toluene)	ppbv	0.2	81.9 J	77.4 J	78.6 J	79.3 J
1,3,5-Trimethylbenzene ^b	ppbv	0.2	81.9 J	77.4 J	78.6 J	79.3 J
1,2,4-Trimethylbenzene	ppbv	0.2	199	186	194	193
1,4-Dichlorobenzene	ppbv	0.2	44.5	42.3	43.2	43.4
1,3-Dichlorobenzene	ppbv	0.2	0.6	0.7	ND	0.5
Benzyl Chloride	ppbv	0.2	3.8	4.5	10.5	6.3
1,2-Dichlorobenzene	ppbv	0.2	2.8	2.7	ND	1.9

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
1,1,2,3,4,4-Hexachloro-1,3-butadiene	ppbv	0.2	1.1	1.3	1.3	1.2
1,2,4-Trichlorobenzene	ppbv	0.2	0.5	1.3	1.2	1.0
Acrylonitrile	ppbv	20	ND	ND	ND	ND
Dichlorofluoromethane (Freon 21)	ppbv	20	ND	ND	ND	ND
Chlorodifluoromethane (Freon 22)	ppbv	20	ND	ND	ND	ND
Ethyl Mercaptan (Ethanediol)	ppbv	20	ND	ND	ND	ND
Carbonyl Sulfide (Carbon oxysulfide)	ppbv	20	ND	ND	ND	ND

ND – Constituent not detected at the stated detection limits

J – Value is categorized as an estimate per EPA QA/G-8 guidance

^a In computing averages, when all measurements are ND, the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50 percent of the stated MDL. If MDL is not reported, a ND measurement is treated as zero.

^b 1-Ethyl-4-methylbenzene (4-Ethyl Toluene) and 1,3,5-Trimethylbenzene co-eluted from the GC and also have the same quantitation ions, thus making them indistinguishable. Therefore, the reported values represent the combined concentrations of these two compounds.

^c Analyte detected in blank sample: acetone = 3.3 ppbv, methylene chloride = 1.4 ppbv, bromomethane = 1.03 ppbv

^d Spike recovery: ethanol = 2-4 percent, m/p-xylene = 230 percent

^e RSD: isopropyl alcohol – 56.3 percent, hexane = 40.7 percent

4.1.2.2 Non-methane Organic Compounds (NMOCs)

Non-methane organic compounds (NMOCs) in the raw LFG were analyzed by Method 25C on the Method 40 samples. The NMOC concentrations in the raw LFG are presented in Table 4-2. This table also includes concentrations of CH₄, CO₂, O₂, and nitrogen (N₂) that are results obtained as part of the NMOC analyses. The moisture concentration data were obtained from the Method 23 PAH/PCB sample train measurements.

The other analytes, oxygen (O₂), carbon dioxide (CO₂), and moisture, are not pollutants but are of interest as they are useful indicators of the “quality” of the raw LFG. The concentrations of nitrogen (N₂) and O₂ are also indicators of the extent of ambient air infiltration into the LFG collection. Method 25C for NMOC determination specifically

recommends that these measurements be made to determine potential air infiltration. Therefore, while measurements for methane (CH₄), CO₂, O₂, and N₂ by Method 3C were not included in the original QAPP, these measurements were included and performed.

Table 4-2. Raw Landfill Gas Non-Methane Organic Compound (NMOC) Concentrations

	NMOC (ppmv as Hexane)	CH ₄ (% v/v)		CO ₂ (% v/v)		O ₂ (%v/v)	N ₂ (% v/v)	Moisture (% v/v)
	Method 25C	Method 25C	Method 3C	Method 25C	Method 3C	Method 3C	Method 3C	Method 23
Run 1	297	48.0	43.5	38.1	35.2	1.6	12.7	12.3
Run 2	334	48.7	44.5	38.6	36.1	1.8	13.4	12.0
Run 3	492	49.8	45.4	39.4	36.9	1.7	13.1	11.6
Average	374	48.8	44.5	38.7	36.1	1.7	13.1	12.0

Concentrations are reported without correction for nitrogen.

Method 25C analysis hold time was up to 51 days. Method specified hold time was 30 days.

4.1.2.3 Hydrogen Sulfide (H₂S)

Raw LFG pipe H₂S concentrations were obtained by collecting and analyzing the samples in accordance with EPA Method 11. These results are presented in Table 4-3.

Table 4-3. Raw Landfill Gas Hydrogen Sulfide Concentrations

	H ₂ S Concentration	
	(mg/m ³)	(ppmv)
Run 1	26.1	18.4
Run 2	18.7	13.2
Run 3	10.7	7.6
Average	18.5	13.0

4.1.2.4 Carbonyls

The target carbonyl compounds, formaldehyde and acetaldehyde, were analyzed by Method TO-11 on samples collected by EPA Method 0100. The analysis results are presented in Table 4-4.

Table 4-4. Raw Landfill Gas Carbonyls Concentrations

	Formaldehyde ^a		Acetaldehyde	
	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)
MDL	2.1	1.7	4.2	2.3
Run 1	2.3 J	1.8 J	18.9	10.3
Run 2	5.0 J	4.0 J	67.8	37.0
Run 3	5.0 J	4.0 J	50.3	27.4
Average	4.1 J	3.3 J	45.7	24.9

^a Measured formaldehyde values were near MDL

4.1.2.5 Mercury (Hg)

Mercury (Hg) can exist in several forms. This test program focused on the elemental, monomethyl, and dimethyl forms of Hg, and total Hg. Elemental Hg was measured with the LUMEX instrument. Organic monomethyl Hg, dimethyl Hg, and total Hg were sampled and analyzed using the organic mercury method.

4.1.2.5.1 Total Mercury (Hg) Samples

To collect the total Hg samples, an iodated charcoal trap was used as a sorbent. A backup tube was also present to assess any breakthrough. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull samples through the train and collect the samples. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-5 presents the total Hg concentrations in the raw LFG. They ranged from 601 to 676 ng/m^3 with an average of 632 ng/m^3 . Spike recovery for total Hg samples was 95 percent.

Table 4-5. Raw Landfill Gas Total Mercury Concentrations

	Total Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppm)
MDL	50	6.0
Run 1	676	81.4
Run 2	618	74.4
Run 3	601	72.4
Average	632	76.1

Sample hold time exceeded 14 days

4.1.2.5.2 Dimethyl Mercury (Hg) Samples

To collect the dimethyl Hg sample, a Carbotrap was used as a sorbent. A backup tube was also present to assess any breakthrough. A third iodated carbon trap was also present to collect any elemental Hg present. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-6 presents the dimethyl Hg concentrations in the raw LFG. The analyzed concentrations ranged from 5.1 to 8.2 ng/m³ with an average of 7.1 ng/m³. However, spike recovery for the dimethyl Hg traps was only 41 percent, well below normally acceptable levels. The spiked traps, without being exposed to the raw LFG, had recoveries from 68 to 98 percent with an average of 83 percent. Recoveries were low in the spiked traps possibly because of the presence of an unknown interfering compound either destroying or masking the detection of the dimethyl Hg. For this reason, dimethyl Hg concentrations data were flagged with “R” to indicate that the data were rejected. Further development of this procedure was being undertaken by Frontier Geosciences. More studies are needed to develop an acceptable method to determine the actual dimethyl Hg concentrations more accurately.

Table 4-6. Raw Landfill Gas Dimethyl Mercury Concentrations

	Dimethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.5	0.05
Run 1	5.1 R	0.53 R
Run 2	8.0 R	1.8 R
Run 3	8.2 R	1.9 R
Average	7.1 R	0.74 R

Sample hold time exceeded 14 days

Spike recoveries were 0 – 5 percent

R – Results are rejected due to serious deficiencies per EPA QA/G-8 guidance

4.1.2.5.3 Monomethyl Mercury (Hg) Samples

To collect the sample, a set of three impingers filled with 0.001 M HCl was used to collect the monomethyl Hg. An empty fourth impinger was used to knockout any impinger solution carryover to the pump and meter system. A diaphragm air pump was used to pull the sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

As shown in Table 4-7, monomethyl Hg concentrations in the raw LFG ranged from non-detect to 1.2 ng/m³. Spike recovery for the monomethyl Hg sample was 70 percent.

Table 4-7. Raw Landfill Gas Monomethyl Mercury Concentrations

	Monomethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.13	0.014
Run 1	ND	ND
Run 2	ND	ND
Run 3	1.2	0.13
Average	0.4	0.04

Sample hold time exceeded 14 days

Relative standard deviation (RSD) of replicate sample exceeded ±30 percent

4.1.2.5.4 Elemental Mercury (Hg)

Elemental Hg was determined by the LUMEX instrument and the results are presented in Table 4-8.

Table 4-8. Raw Landfill Gas Elemental Mercury Concentrations

	Concentration ^a			
	Background ^b		Gas Pipe	
	(ng/m ³)	(x10 ⁻⁶ ppmv)	(ng/m ³)	(x10 ⁻⁶ ppmv)
Run 1	0.001	0	280	33.7
Run 2	0.001	0	325	39.1
Run 3	0.000	0	320	38.5
Average	0.001	0	308	37.1

^a Average of three readings, each of 30-second duration

^b Background measurement was made by sampling ambient air drawn through ice-chilled empty impinger

4.2 Engine Stack Results

The engine stack was sampled for NMOCs (as THC_s), PCDD/PCDF_s, PAH_s, HCl, metals (Pb, As, Cd, Cr, Mn, Ni, total Hg), SO₂, NO_x, CO, CO₂, and O₂. The stack cross section was divided into 6 equal areas according to EPA Method 1. Sampling run time for HCl and metals was 60 minutes. Run time for PCDD/PCDF_s sampling was 180 minutes. Run time for CEMS parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) varied.

4.2.1 Engine Stack Gas Flow Rate and Temperature

Sampling at the engine stack was conducted at isokinetic conditions. The procedures provided stack gas velocity distribution across the engine stack and reliable measurements of stack gas flow rates. Table 4-9 lists the volumetric flow rates and temperatures at the engine stack measured during the various sampling runs.

4.2.2 Engine Stack Gas Constituents

The concentrations of the constituents of interest in the engine stack are presented in the following Subsections 4.2.2.1 through 4.2.2.7.

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Table 4-9. Engine Stack Gas Operating Conditions Measured during Sampling

Run Number	Date	Time	Average Stack Temp (°F)	Carbon Dioxide (%) ^a	Oxygen (%) ^b	Moisture (%)	Velocity (actual ft/sec)	Volumetric Flow Rate (acfm)	Volumetric Flow Rate (dscfm)
A-Post-M26-110102-01	11/01/02	15:32 - 16:57	732	12.8	7.5	12.3	149	3330	1290
A-Post-M26-110102-02	11/01/02	15:34 - 16:59	732	12.8	7.5	12.3	149	3330	1290
A-Post-M26-110202-03	11/02/02	13:10 - 14:17	734	13.2	7.4	12.5	154	3430	1330
A-Post-M29-110102-01	11/01/02	17:42 - 18:55	737	12.8	7.5	11.9	150	3340	1300
A-Post-M29-110102-02	11/01/02	17:44 - 18:57	737	12.8	7.5	11.3	150	3340	1310
A-Post-M29-110202-03	11/02/02	13:13 - 11:21	734	13.2	7.4	12.4	154	3430	1330
A-Post-M23-110102-01	11/01/02	11:09 - 13:30	738	12.8	7.5	12.3	150	3350	1290
A-Post-M23-110102-02	11/01/02	11:12 - 14:33	738	12.8	7.5	12.0	150	3350	1300
A-Post-M23-110202-03	11/02/02	09:01 - 12:14	733	13.2	7.4	11.6	154	3430	1340
Average			735	12.9	7.5	12.1	151	3370	1310

Engine stack cross-section flow area is 0.37 sq. ft.

^a Calibration bias = 2.2 – 3.3%, System bias = 1.1 – 4.3%, Drift = 2.2 – 5.4%

^b Calibration bias = 0 – 3.3%, System bias = 0 – 2.2%, Drift = 2.2 – 3.3%

4.2.2.1 Engine Stack Oxygen and Carbon Dioxide

Oxygen (O₂) and CO₂ concentrations provide an overall indication of the combustion process. Figure 4-1 shows the O₂ and CO₂ concentrations measured by the CEMs during the two days of testing. The plotted data included the CEM responses to the instrument zeroing and calibration periods on November 1, 2002. The end-of-test calibration data were included on the November 2, 2003 plot. These periods manifest as the peaking and bottoming of the recorded values. Table 4-10 presents the daily averages of O₂ and CO₂ concentrations.

4.2.2.2 Engine Stack Total Hydrocarbon (THC) Concentrations

Engine stack THC concentrations were measured by EPA Method 25A that used a CEMs. At the engine stack, hydrocarbon (including NMOCs) concentrations were found to be below 50 ppmv. The low concentrations rendered Method 25C, the method designed specifically for NMOC measurement, unsuitable to be applied at this location.

Instead, EPA Method 25A produced concentrations of all hydrocarbons that respond to FID analysis. Real-time continuous instrument responses are shown in Figure 4-2. The time-averaged concentrations are presented in Table 4-11. As can be seen, the concentrations of THC ranged from 323 to 393 ppmv as hexane.

4.2.2.3 Engine Stack Dioxin/Furan (PCDD/PCDFs) Emissions

Three EPA Method 23 sampling runs were performed. As a cost-saving measure, only the samples from one run (Run 3) were analyzed. Samples from runs 1 and 2 have been extracted and are being held in the laboratory and are available for possible future analysis, if deemed necessary.

Table 4-12 presents the engine stack PCDD/PCDF-emissions data. Table 4-13 presents the same data, but expressed in terms of Toxicity Equivalent emissions.

4.2.2.4 Engine Stack Polycyclic Aromatic Hydrocarbon (PAH) Emissions

The concentrations of PAHs were obtained by analyzing a Method 23 sample using Method 8270. As a cost-saving measure, only the sample from Run 3 was analyzed. Two additional samples were collected and extracted but not analyzed. The PAH concentrations in the Run 3 sample are presented in Table 4-14.

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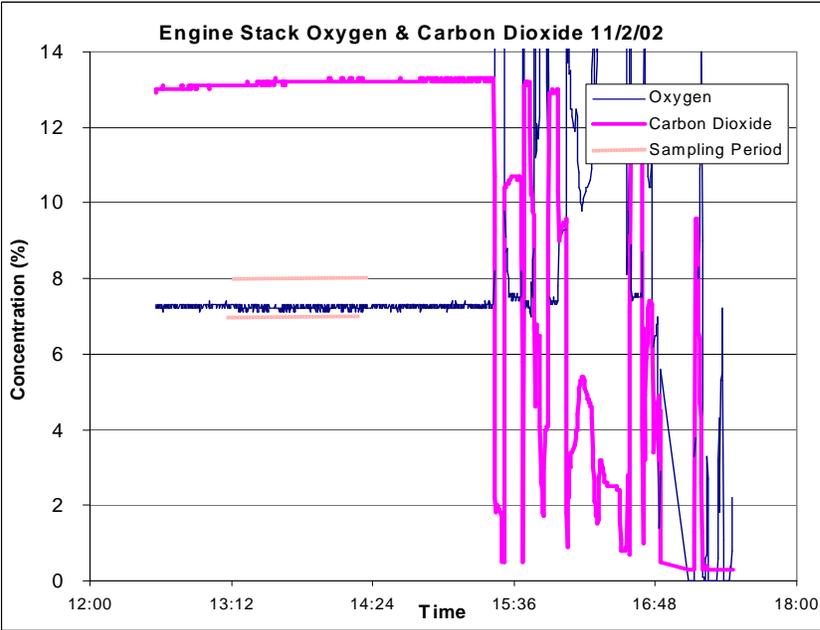
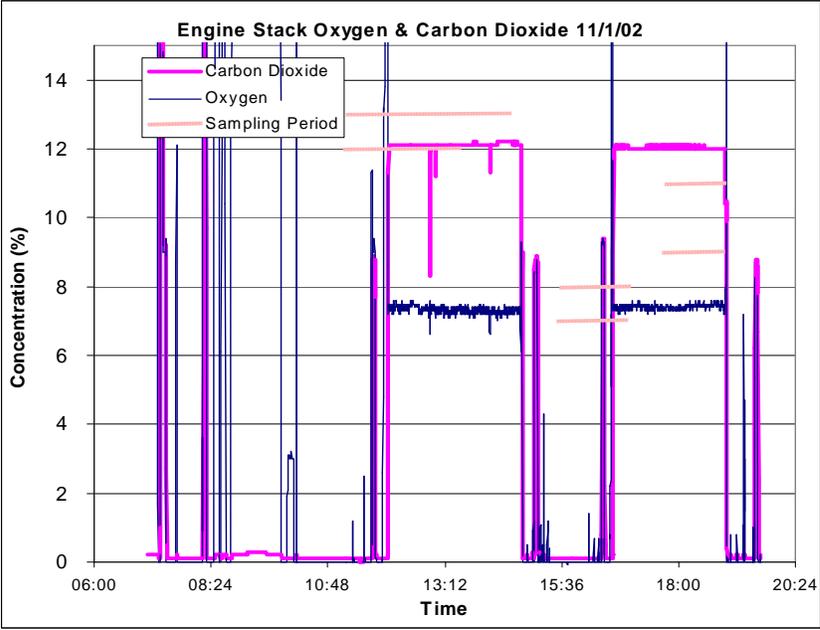


Figure 4-1. Engine Stack Oxygen and Carbon Dioxide Concentrations

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Table 4-10. Engine Stack Combustion Product Concentrations.

	O₂ (% v)^a	CO₂ (% v)^b
Run 1	7.4	12.7
Run 2	7.6	12.8
Run 3	7.4	13.2
Average	7.5	12.9

^a Calibration bias = 2.2 – 3.3%, System bias = 1.1 – 4.3%, Drift = 2.2 – 5.4%

^b Calibration bias = 0 – 3.3%, System bias = 0 – 2.2%, Drift = 2.2 – 3.3%

Table 4-11. Engine Stack THC Concentrations

	THC (ppmdv as propane)	THC (ppmdv as hexane)
Run 1	759	380
Run 2	786	393
Run 3	645	323
Average	730	365

Calibration bias = 0 – 3.8%, System bias = 0 – 3.8%, Drift = 0 – 3.3%

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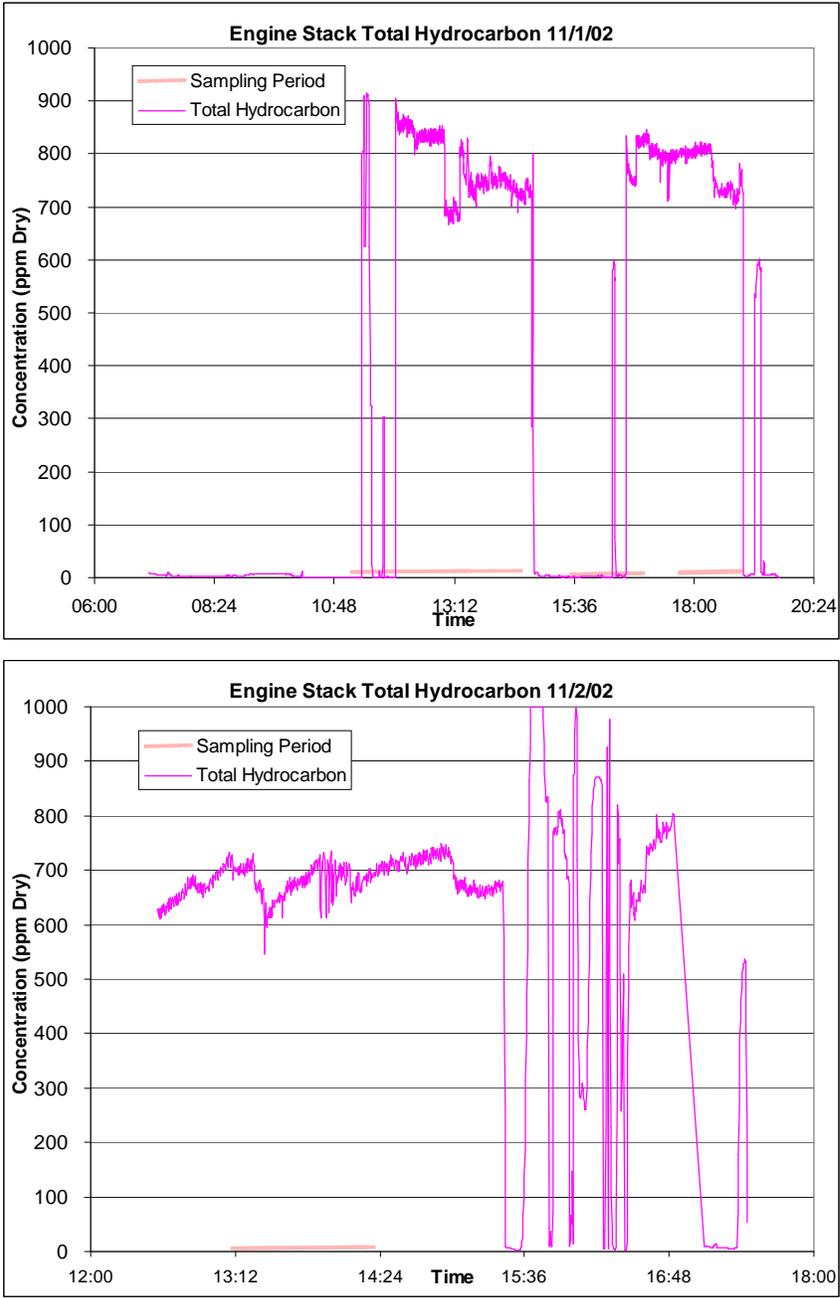


Figure 4-2. Engine Stack Total Hydrocarbon Concentrations

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Table 4-12. Engine Stack Dioxins and Furans Emissions

Analyte	A-POST-M23-110202-03		
	Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
Dioxins			
2,3,7,8-TCDD	<0.48	<1.1	<2.4
Other TCDD	22.0	50.1	110.5
1,2,3,7,8-PeCDD	<0.37	<0.84	<1.8
Other PeCDD	3.4	7.6	16.9
1,2,3,4,7,8-HxCDD	<1.2	<2.8	<6.1
1,2,3,6,7,8-HxCDD	<1.1	<2.6	<5.7
1,2,3,7,8,9-HxCDD	<1.2	<2.6	<5.8
Other HxCDD	0.239	0.545	1.2
1,2,3,4,6,7,8-HpCDD	<1.8	<4.1	<9.1
Other HpCDD	0.0	0.0	0.0
1,2,3,4,6,7,8,9-OCDD	<2.0	<4.6	<10.2
Total CDD	<33.8	<77.0	<170
Furans			
2,3,7,8-TCDF	<0.70	<1.6	<3.5
Other TCDF	46.6	106	234
1,2,3,7,8-PeCDF	<0.64	<1.5	<3.2
2,3,4,7,8-PeCDF	<0.59	<1.4	<3.0
Other PeCDF	3.4	7.7	16.9
1,2,3,4,7,8-HxCDF	<1.3	<3.0	<6.7
1,2,3,6,7,8-HxCDF	<1.3	<3.0	<6.7
2,3,4,6,7,8-HxCDF	<1.3	<3.0	<6.7
1,2,3,7,8,9-HxCDF	<0.28	<0.65	<1.4
Other HxCDF	1.3	3.0	6.6
1,2,3,4,6,7,8-HpCDF	<1.5	<3.4	<7.6
1,2,3,4,7,8,9-HpCDF	<0.16	<0.36	<0.80
Other HpCDF	0.0	0.0	0.0
1,2,3,4,6,7,8,9-OCDF	<1.3	<3.0	<6.6
Total CDF	13.9	138	304
Total CDD/CDF	<47.6	<214.8	<473.6

Two additional samples were collected, extracted and held in the laboratory for possible future analyses: A-POST-M23-110102-01 and A-POST-M23-110102-02

"<" denotes the measurement was non-detect. The value following the "<" sign is the detection limit.

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Table 4-13. Engine Stack Dioxins and Furans Toxicity Equivalent Emissions

Pollutant	A-POST-M23-110202-03			1989 Toxicity Equivalency Factor	Toxicity Equivalent Emissions		
	Concentration	Emission Rate			Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
<u>Dioxins</u>							
2,3,7,8-TCDD	<0.48	<1.1	<2.4	1	<0.48	<1.1	<2.4
Other TCDD	22.0	50.1	111	---	NA	NA	NA
1,2,3,7,8-PeCDD	<0.37	<0.84	<1.8	0.5	<0.18	<0.42	<0.92
Other PeCDD	3.4	7.6	17	---	NA	NA	NA
1,2,3,4,7,8-HxCDD	<1.2	<2.8	<6.1	0.1	<0.12	<0.28	<0.61
1,2,3,6,7,8-HxCDD	<1.1	<2.6	<5.7	0.1	<0.11	<0.26	<0.57
1,2,3,7,8,9-HxCDD	<1.2	<2.6	<5.8	0.1	<0.12	<0.26	<0.58
Other HxCDD	0.239	0.545	1.2	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDD	<1.8	<4.1	<9.1	0.01	<0.018	<0.041	<0.091
Other HpCDD	0.0	0.0	0.0	---	NA	NA	NA
1,2,3,4,6,7,8,9-OCDD	<2.0	<4.6	<10.2	0.001	<0.0020	<0.0046	<0.0102
Total CDD	<33.8	77.0	170	---	<1.0	2.4	5.2
<u>Furans</u>							
2,3,7,8-TCDF	<0.70	<1.6	<3.5	0.1	<0.070	<0.16	<0.35
Other TCDF	46.6	106	234	---	NA	NA	NA
1,2,3,7,8-PeCDF	<0.64	<1.5	<3.2	0.05	<0.032	<0.073	<0.16

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Pollutant	A-POST-M23-110202-03			1989 Toxicity Equivalency Factor	Toxicity Equivalent Emissions		
	Concentration	Emission Rate			Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
2,3,4,7,8-PeCDF	<0.59	<1.4	<3.0	0.5	<0.30	<0.68	<1.5
Other PeCDF	3.4	7.7	17	---	NA	NA	NA
1,2,3,4,7,8-HxCDF	<1.3	<3.0	<6.7	0.1	<0.13	<0.30	<0.67
1,2,3,6,7,8-HxCDF	<1.3	<3.0	<6.7	0.1	<0.13	<0.30	<0.67
2,3,4,6,7,8-HxCDF	<1.3	<3.0	<6.7	0.1	<0.13	<0.30	<0.67
1,2,3,7,8,9-HxCDF	<0.28	<0.65	<1.4	0.1	<0.028	<0.065	<0.14
Other HxCDF	1.3	3.0	6.6	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDF	<1.5	<3.4	<7.6	0.01	<0.015	<0.034	<0.076
1,2,3,4,7,8,9-HpCDF	<0.16	<0.36	<0.80	0.01	<0.0016	<0.0036	<0.008
Other HpCDF	0.0	0.0	0.0	---	NA	NA	NA
1,2,3,4,6,7,8,9-OCDF	<1.3	<3.0	<6.6	0.001	<0.0013	<0.0030	<0.0066
Total CDF	<13.9	<138	<304	---	<0.844	<1.9	<4.2
Total CDD/CDF	<47.6	<216	<474	---	<1.9	<4.3	<9.5

NA – Not applicable because no Toxicity Equivalent Factor is available

“<” denotes the measurement was non-detect. The value following the “<” sign is the detection limit.

Table 4-14. Engine Stack Polycyclic Aromatic Hydrocarbons Emissions

Analyte	Formula Weight	A-POST-M23-110202-03			
		Concentration		Emission Rate	
		(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁻⁶ g/hr)	(x10 ⁻⁶ lb/hr)
Acenaphthene	154.21	81.3	521	1200	2.6
Acenaphthylene	152.20	116	731	1700	3.7
Anthracene	178.23	15.7	116	265	0.58
Benzo(a)anthracene	228.30	4.3	41	94	0.21
Benzo(a)pyrene	252.32	0.31	3.2	7.3	0.016
Benzo(b)fluoranthene	252.32	2.1	22	50	0.11
Benzo(g,h,i)perylene	276.34	1.3	15	34	0.074
Benzo(k)fluoranthene	252.32	0.61	6.4	15	0.032
Chrysene	228.29	15.2	144	329	0.725
Dibenzo(a,h)anthracene	278.35	0.27	3.2	7.2	0.016
Fluoranthene	202.26	18.3	154	351	0.774
Fluorene	166.22	138	950	2200	4.8
Indeno(1,2,3-cd)pyrene	288.35	0.555	6.6	15	0.033
Naphthalene	128.17	3400	17900	40800	90
Phenanthrene	178.23	256	1900	4300	9.5
Pyrene	202.26	20.8	175	400	0.88
2-Methylnaphthalene	142.20	1300	7580	17300	38
Benzo(e)Pyrene	252.32	1.6	17	38	0.085
Perylene	253.31	0.29	3.1	7.0	0.016

Two additional samples were collected, extracted and held in the laboratory for possible future analyses: A-POST-M23-110102-01 and A-POST-M23-110102-02

Samples were extracted within method-specified 14-day hold time. The Run 3 sample extract was analyzed 50 days after extraction. The method specified extract hold time to be 40 days.

4.2.3 Hydrogen Chloride (HCl) Emission Results

Engine stack HCl emissions results are presented in Table 4-15.

Table 4-15. Engine Stack Hydrogen Chloride Emissions

	HCl Concentration		HCl Emission Rate	
	(ppmdv)	(mg/m ³)	(lb/hr)	(g/hr)
Run 1	2.7	4.1	0.0197	8.9
Run 2	2.7	4.3	0.0200	9.1
Run 3	2.8	4.4	0.0213	9.7
Average	2.7	4.3	0.0203	9.2

4.2.3.1 Metals Emissions Results

Toxic heavy metals in the engine stack gases were measured by Method 29. Manganese was determined by inductively coupled plasma – mass spectroscopy (ICP-MS). Arsenic (As), Cd, Cr, Pb, and Ni were determined by graphite furnace atomic absorption spectroscopy (GFAAS). Mercury was determined by cold vapor (CV) AA and was not detected in any of the samples. Table 4-16 presents the engine stack metals emissions results.

Elemental mercury (Hg⁰) concentration was separately measured by the LUMEX instrument and those results are also included in Table 4-16.

Table 4-16. Engine Stack Metal Emissions

Analyte	A-POST-M29-110102-01			A-POST-M29-110102-02			A-POST-M29-110202-03			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)
Arsenic	3.6	7.9	17.5	3.0	6.6	15	2.3	5.2	11.5	3.0	6.6	14.5
Cadmium	0.78	1.7	3.8	0.18	0.4	0.87	0.144	0.3	0.716	0.367	0.8	1.8
Chromium	9.6	21	46.6	11.0	24	53.7	4.8	11	24.0	8.5	18.8	41.4
Lead	11.9	26.3	58.1	5.5	12	27.1	0.69	1.5	3.4	6.1	13.4	29.5
Manganese	12.1	26.8	59.0	8.4	19	41.0	19.8	44.7	98.5	13.5	30	66.2
Nickel	2.0	4.4	9.8	16.0	34.4	78.2	11.1	25	55.1	9.5	21.3	46.9
Mercury (Total by Method 29)	<1.7	<0.004	<8.2	<1.6	<0.004	<8.0	<1.5	<0.003	<7.6	ND	ND	ND
	RUN 1			RUN 2			RUN 3			Average		
Mercury (Elemental by LUMEX)	0.027	0.060	0.13	0.032	0.071	0.16	NM	NM	NM	0.030	0.066	0.14

4.2.3.2 Gaseous Concentrations: Carbon Monoxide (CO), Sulfur Dioxide (SO₂), and Nitrogen Oxides (NO_x)

Gaseous emissions were measured with CEMs and included CO, SO₂ and NO_x. These results are summarized in Table 4-17. The detailed CEM measurement plots are shown in Figures 4-3 through 4-5.

Table 4-17. Engine Stack CO, SO₂, NO_x Concentrations

	Concentration (ppmdv)		
	CO	SO ₂	NO _x (as NO)
Run 1	562	NM	172
Run 2	549	39	142
Run 3	570	29	183
Average	560	34	166

NM = Not measured. Instrument was not ready.

4.3 Comparison with AP-42 Default Values

One of the major objectives of the test program was to expand on the database of LFG constituent compounds and their concentrations. If warranted, these data may contribute towards updating the AP-42 default values.

Table 4-18 presents the concentrations of LFG constituents to provide direct comparisons with AP-42 default emission concentration values. Table 4-19 presents the concentration of other constituents targeted by the various analyses but not listed in AP-42. An expanded discussion and comparison is included in the overall project summary report.

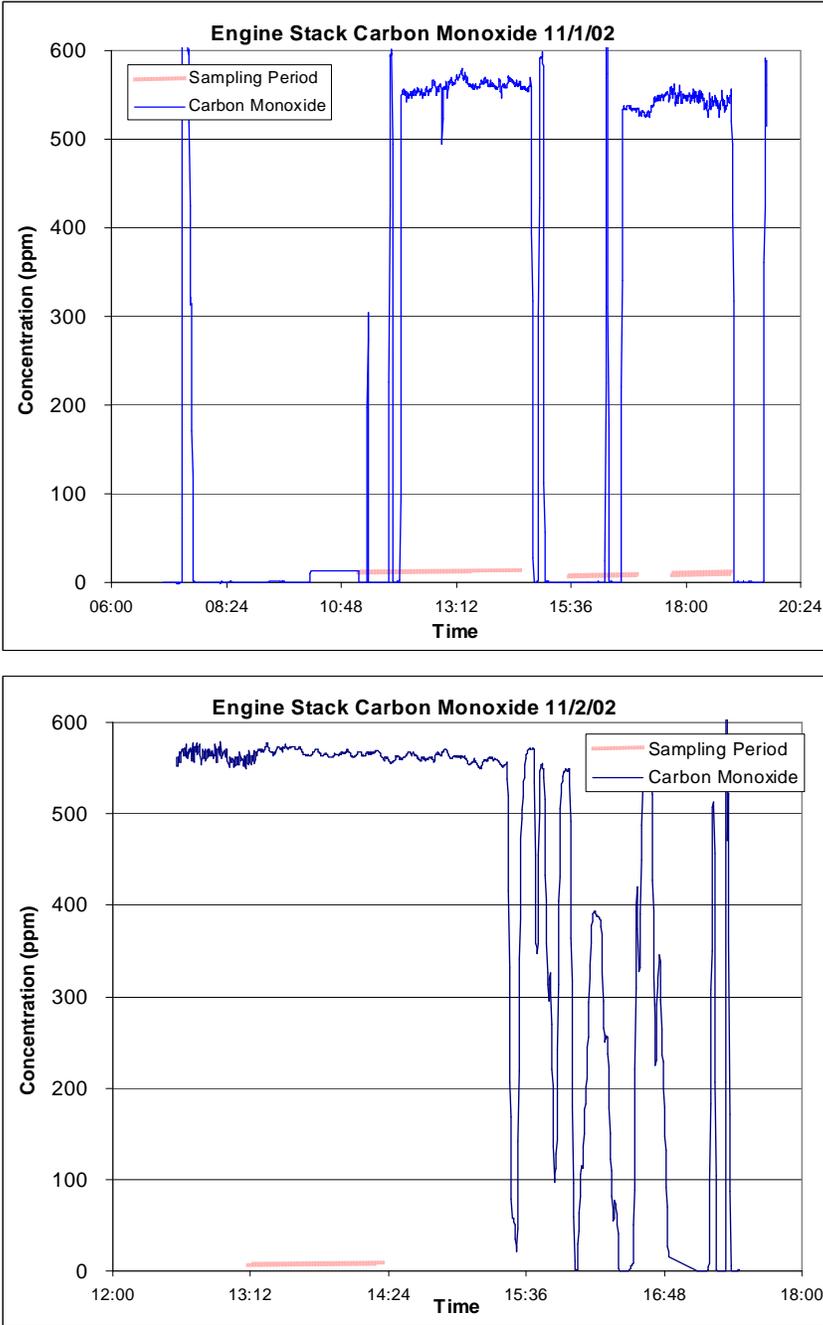


Figure 4-3. Engine Stack Carbon Monoxide Concentrations

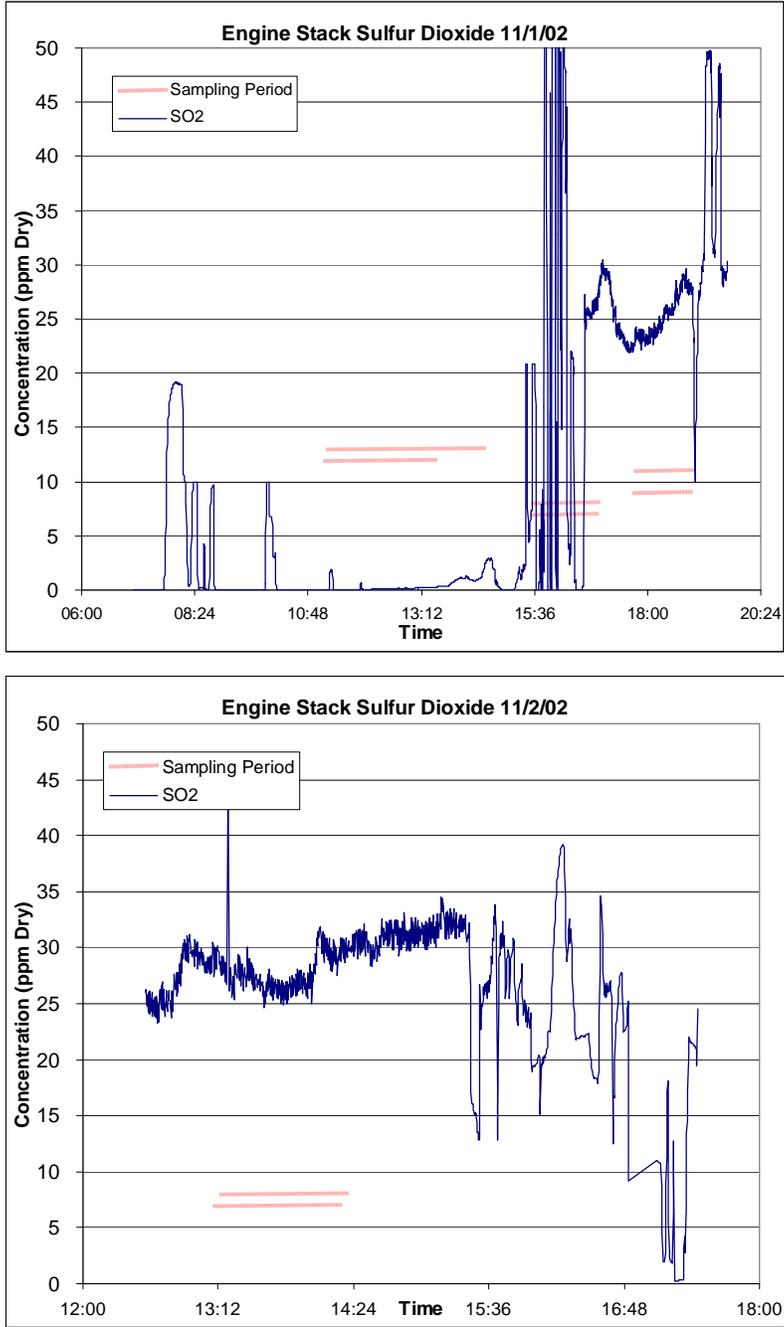


Figure 4-4. Engine Stack Sulfur Dioxide Concentrations

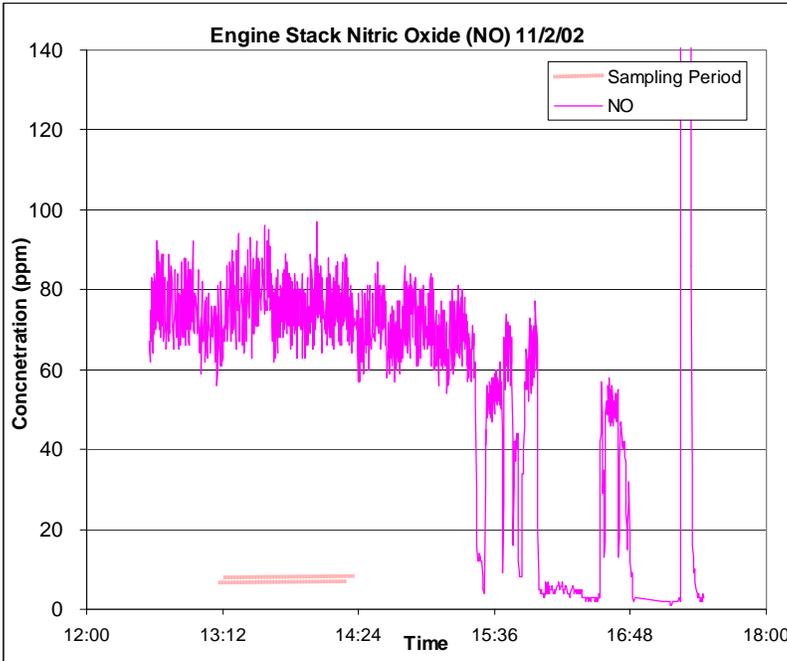
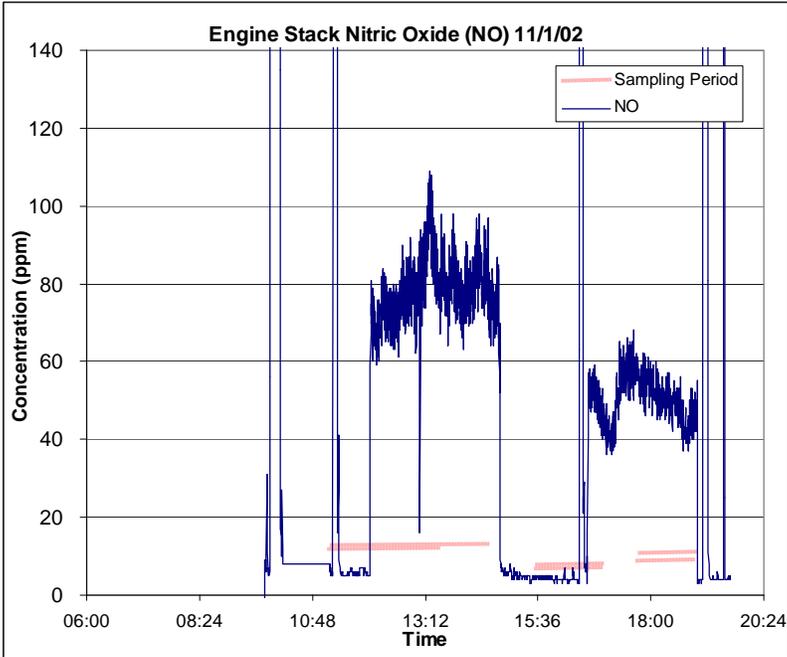


Figure 4-5. Engine Stack Nitric Oxide Concentrations

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Table 4-18. Comparison of Raw Landfill Gas Constituent Concentrations with AP-42 Default Values

Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1,1,1-Trichloroethane	71-55-6	133.42	0.48	0.0002	0.005	1.7	27	73	0.16
M-40	1,1,2,2-Tetrachloroethane	79-34-5	167.85	1.11	0.0002	0.0297	12.9	206	554	1.2
M-40	1,1-Dichloroethane (Ethylidene Dichloride)	75-34-3	98.96	2.35	0.0002	0.033	8.6	140	368	0.811
M-40	1,1-dichloroethene	75-35-4	96.94	0.20	0.0002	0.002	0.420	6.7	18	0.040
M-40	1,2-Dichloroethane	107-06-2	98.96	0.41	0.0002	0.001	0.264	4.2	11	0.025
M-40	1,2-Dichloropropane	78-87-5	112.98	0.18	0.0002	0.001	0.227	3.6	9.8	0.022
M-40	Isopropyl alcohol (2-Propanol)	67-63-0	60.11	50.10	0.0002	0.114	17.7	283	759	1.70
M-40	Acetone	67-64-1	58.08	7.01	0.0002	0.33	49.2	788	2120	4.70
M-40	Acrylonitrile	107-13-1	53.06	6.33	0.0002	ND	ND	ND	ND	ND
M-40	Bromodichloromethane	75-27-4	163.83	3.13	0.0002	0.003	1.1	18	48	0.10
M-40	Butane	106-97-8	58.12	5.03		4.87	731	11700	31400	69.3
M-40	Carbon Disulfide	75-15-0	76.13	0.58	0.0002	0.014	2.8	46	120	0.269
No Test	Carbon Monoxide	630-08-0	28.01	141		NM	NM	NM	NM	NM
M-40	Carbon Tetrachloride	56-23-5	153.84	0.004	0.0002	0.00083	0.33	5.3	14	0.031
No Test	Carbonyl Sulfide (Carbon oxysulfide)	463-58-1	60.07	0.49	0.0002	NM	NM	NM	NM	NM
M-40	Chlorobenzene	108-90-7	112.56	0.25	0.0002	0.195	56.6	907	2440	5.40
M-40	Chlorodifluoromethane (Freon 22)	75-45-6	86.47	1.30	0.0002	ND	ND	ND	ND	ND
M-40	Chloroethane (Ethyl Chloride)	75-00-3	64.52	1.25	0.0002	0.77	128	2060	5520	12.2
M-40	Chloroform	67-66-3	119.39	0.03	0.0002	0.040	12	200	530	1.20

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	Chloromethane	74-87-3	50.49	1.21	0.0002	0.012	1.6	25	68	0.15
M-40	1,4-Dichlorobenzene	106-46-7	147.00	0.21	0.0002	0.043	17	260	708	1.6
M-40	1,3-Dichlorobenzene	541-73-1	147.00	0.21	0.0002	0.00047	0.18	2.9	7.7	0.0169
M-40	1,2-Dichlorobenzene	95-50-1	147.01	0.21	0.0002	0.00203	0.77	12	33	0.0731
M-40	Dichlorodifluoromethane (Freon 12)	75-71-8	120.91	15.70	0.0002	0.118	36.8	590	1580	3.50
M-40	Dichlorofluoromethane (Freon 21)	75-43-4	102.92	2.62	0.0002	ND	ND	ND	ND	ND
M-40	Methylene Chloride (Dichloromethane)	75-09-2	84.94	14.30	0.0002	0.997	219	3510	9410	20.8
No Test	Dimethyl Sulfide (Methyl sulfide)	75-18-3	62.13	7.82		NM	NM	NM	NM	NM
M-40	Ethane	74-84-0	30.07	889		6.2	480	7800	21000	45.4
M-40	Ethanol	64-17-5	46.08	27.20	0.0002	0.020	2.4	38	100	0.22
M-40	Ethyl Mercaptan (Ethanediol)	75-08-1	62.13	2.28	0.020	ND	ND	ND	ND	ND
M-40	Ethylbenzene	100-41-4	106.16	4.61	0.0002	0.58	160	2500	6800	15
M-40	1,2-Dibromoethane (Ethylene dibromide)	106-93-4	187.88	0.001	0.0002	0.001	0.5	8.3	22	0.049
M-40	Trichloromonofluoromethane (Fluorotrichloromethane) (F11)	75-69-4	137.38	0.76	0.0002	0.051	18	290	790	1.7
M-40	Hexane	110-54-3	86.18	6.57	0.0002	2.47	550	8810	23700	52.1
M-11	Hydrogen Sulfide	7783-06-4	34.08	35.50		13.1	1200	18400	49500	109
Organic mercury	Mercury (Dimethyl)		230.66	Not Listed	0.05E-06	R	R	R	R	R

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
LUMEX	Mercury (Elemental)	7439-97-6	200.61	Not Listed		37E-06	0.019	0.31	0.83	0.0018
Organic mercury	Mercury (Monomethyl)		215.62	Not Listed	0.014E-06	130E-09	0.000073	0.0012	0.0031	0.0000069
Organic mercury	Mercury (Total)		215.63	253.0E-6	6E-06	300E-06	0.17	2.7	7.1	0.016
M-40	2-Butanone (Methyl Ethyl Ketone)	78-93-3	72.10	7.09	0.0002	0.27	51	820	2200	4.8
M-40	2-Hexanone (Methyl Butyl Ketone)	591-78-6	100.16	1.87	0.0002	0.557	144	2310	6200	14
M-40	Methyl Mercaptan (Methanethiol)	74-93-1	48.11	2.49	0.020	ND	ND	ND	ND	ND
M-40	Pentane	109-66-0	72.15	3.29	1	3.20	597	9560	25700	56.6
M-40	Tetrachloroethylene (Perchloroethylene)	127-18-4	165.83	3.73	0.0002	0.042	18	290	780	1.7
M-40	Propane	74-98-6	44.09	11.10	1	8.9	1000	16000	44000	97
M-40	t-1,2-Dichloroethene	156-60-5	96.94	2.84	0.0002	0.003	0.7	11	29	0.064
M-40	Trichloroethylene (Trichloroethene)	79-01-6	131.38	2.82	0.0002	0.028	9.5	150	410	0.90
M-40	Vinyl Chloride	75-01-4	62.50	7.34	0.0002	0.097	15.7	251	674	1.5
M-40	m/p-Xylene (Dimethyl Benzene)	1330-20-7	106.16	12.10	0.0002	3.73	1000	16400	44000	97
M-40	o-Xylene (Dimethyl Benzene)	95-47-6	106.16	12.10	0.0002	0.30	82	1300	3500	7.8
M-40	Benzene (Co-disposal)	71-43-2	78.11	11.10	0.0002	0.073	15	240	634	1.4

**Source Test Report
for Landfill A**

Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	Benzene (No-disposal or Unknown)	71-43-2	78.11	1.91	0.0002	0.073	15	240	634	1.4
M-25C	NMOC as Hexane (Co-disposal)		86.17	2420.00		373	83100	1330000	3570000	79000
M-25C	NMOC as Hexane (No-codisposal or Unknown)			595.00		373	83100	1330000	3570000	79000
M-40	Toluene (Methyl Benzene) (Co-disposal)	108-88-3	92.13	165.00	0.0002	1.33	316	5050	13600	29.9
M-40	Toluene (Methyl Benzene) (No or Unknown)			39.30	0.0002	1.33	316	5050	13600	29.9

ND – Non detected at the stated detection limit

R – Data were rejected because of serious deficiency in spike recovery

**Source Test Report
for Landfill A**

Table 4-19. Raw Landfill Gas Constituent Concentrations for Compounds without AP-42 Default Values

Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-0100/ TO-11	Acetaldehyde	75-07-0	44.05	0.0023	0.025	2.9	46	125	0.275
M-0100/ TO-11	Formaldehyde	50-00-0	30.03	0.0017	0.0033	0.259	4.14	11.1	0.0245
M-23	Dioxins/Furans				NM	NM	NM	NM	NM
M-23	PAHs				NM	NM	NM	NM	NM
M-25C	Carbon Dioxide	124-38-9	44.01		387000	44.0E6	705E6	1.89E9	4.17E6
M-25C	Methane	74-82-8	16.04		488000	20.2E6	324E6	0.871E9	1.92E6
M-25C	Oxygen	7782-44-7	32.00		17000	1.4E6	23E6	0.061E9	0.133E6
M-40	1,1,2,3,4,4-Hexachloro-1,3-butadiene	87-68-3	260.76	0.0002	0.001	0.8	13.4	36.0	0.0794
M-40	1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	76-13-1	187.38	0.0002	0.002	0.983	15.8	42.3	0.0932
M-40	1,1,2-Trichloroethane	79-00-5	133.42	0.0002	0.008	2.6	42	113	0.249
M-40	1,2,4-Trichlorobenzene	120-82-1	181.46	0.0002	0.001	0.460	7.4	19.8	0.0436
M-40	1,2,4-Trimethylbenzene	95-63-6	120.19	0.0002	0.19	60.0	961	2580	5.7
M-40	1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	76-14-2	170.92	0.0002	0.008	3.4	55	148	0.325
M-40	1,3,5-Trimethylbenzene	108-67-8	120.19	0.0002	0.079	24.6	395	1060	2.3
M-40	1,3-Butadiene (Vinylethylene)	106-99-0	54.09	0.0002	0.022	3.1	49	132	0.291
M-40	1,4-Dioxane (1,4-Diethylene Dioxide)	123-91-1	88.10	0.0002	0.00203	0.462	7.4	20	0.0438

**Source Test Report
for Landfill A**

Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1-Ethyl-4-methylbenzene (4-Ethyl Toluene)	622-96-8	120.20	0.0002	0.079	24.6	395	1060	2.3
M-40	4-Methyl-2-pentanone (MIBK)	108-10-1	100.16	0.0002	1.07	278	4450	12000	26.3
M-40	Benzyl Chloride (Chloromethyl Benzene)	100-44-7	126.58	0.0002	0.006	2.0	33	88	0.19
M-40	Bromomethane (Methyl bromide)	74-83-9	94.95	0.0002	0.016	3.8	62	165	0.36
M-40	cis-1,2-Dichloroethene	156-59-2	96.94	0.0002	0.074	18.6	297	798	1.8
M-40	cis-1,3-Dichloropropene	10061-01-5	110.98	0.0002	0.00023	0.065	1.0	2.8	0.0062
M-40	Cyclohexane	110-82-7	84.16	0.0002	0.165	35.9	575	1540	3.4
M-40	Dibromochloromethane	124-48-1	208.29	0.0002	ND	ND	ND	ND	ND
M-40	Ethyl Acetate	141-78-6	88.10	0.0002	1.83	416	6660	17900	39.4
M-40	Heptane	142-82-5	100.20	0.0002	0.24	62.7	1000	2700	5.9
M-40	Methyl-t-butyl Ether (MTBE)	1634-044	88.15	0.0002	0.054	12.4	200	530	1.2
M-40	Styrene (Vinylbenzene)	100-42-5	104.14	0.0002	0.030	7.9	127	342	0.753
M-40	t-1,3-Dichloropropene	1006-02-6	110.98	0.0002	0.00032	0.092	1.5	3.9	0.0087
M-40	Tetrahydrofuran (Diethylene Oxide)	109-99-9	72.10	0.0002	1.18	221	3540	9490	20.9
M-40	Tribromomethane (Bromoform)	75-25-2	252.77	0.0002	0.000423	0.276	4.43	11.9	0.0262
M-40	Vinyl Acetate	108-05-4	86.09	0.0002	0.242	53.9	864	2350	5.1

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5. Quality Assurance/Quality Control

This project produced data that qualified to receive the “A” rating with respect to the rating system described in section 4.4.2 of the *Procedures for preparing Emission Factor Documents* (EPA-454/R-95-015). The cited EPA document provides a clear description of the requirements for an “A” data quality rating. Tests were performed by using an EPA reference test method, or when not applicable, a sound methodology. Tests were reported in enough detail for adequate validation and raw data were provided that could be used to duplicate the emission results presented in this report.

Throughout the results sections of this report, notations and footnotes were included to flag data that, for various reasons, did not meet their associated measurement quality objectives.

5.1 Assessment of Measurement Quality Objectives

Measurement quality objectives (MQOs) were established for each critical measurement and documented in the *Site-Specific QAPP for the Field Evaluation of Landfill Gas Control Technologies-Landfill A*. The following subsections assess MQOs for each measurement to determine if goals were achieved. When applicable, data validation elements performed on laboratory analytical reports are also included.

5.1.1 Continuous Emissions Monitors (CEMs)

The combustion gases O₂, CO/CO₂, SO₂, NO_x and THC were measured in the field using CEMs. The following MQOs were established for CEM measurements for Landfill A:

- Direct calibration bias: ±2 percent
- System bias checks: ±5 percent
- Zero and drift: ±3 percent
- Completeness: >90 percent

Direct calibrations were performed daily prior to testing with certified calibration gases at zero and a minimum of two other concentrations (typically a mid-level concentration and one point near the full-scale end of the instrument range). System bias checks were

Source Test Report for Landfill A

performed pre-test and post-test. Drift checks were performed daily post-test. Table 5-1 summarizes these quality control (QC) checks for all instruments. Not all MQOs were met for all CEM measurements. However, if the calibration and drift check criteria were relaxed to ± 5 percent, then all MQO would have been met. The fact that the original QAPP MQOs were not fully met did not affect the usability of these data. The reported data were notated accordingly.

Table 5-1. CEM MQO Summary for Landfill A

Instrument and Range	Direct Calibration ($\pm 2\%$ criteria)			System Bias Checks ($\pm 5\%$ criteria)			Drift Checks ($\pm 3\%$ criteria)		
	Total (#)	Bias Range (%)	Complete (%)	Total (#)	Bias Range (%)	Complete (%)	Total (#)	Bias Range (%)	Complete (%)
Servomex O ₂ Analyzer (0-21%)	6	0 - 3.3	17	3	0 - 2.2	100	6	2.2 - 3.3	100
Cal Analytical CO ₂ Analyzer (0-20%)	6	2.2 - 3.3	17	3	1.1 - 4.3	100	6	2.2 – 5.4	83
Cal Analytical CO Analyzer (0-650 ppm)	6	0 - 1.7	100	3	0.2 - 1.2	100	6	1.2 – 1.7	100
Cal Analytical SO ₂ Analyzer (0-500 ppm)	6	0 - 3.0	67	3	1.0 2.8	100	6	0.4 – 2.8	67
TECO THC Analyzer (0-1000 ppm)	NA ^a	NA ^a	NA ^a	3	0 - 3.8	100	3	0 – 3.3	67
TECO NO _x Analyzer (0-4000 ppm)	6	0.6 – 7.1	50	3	0.6 - 4.7	100	3	1.4 – 7.1	67

^a The method called for calibration gases to be introduced at a point of the sampling system close to the sampling probe for them to flow through the heated sample line. Calibration gases were not injected directly to the analyzer

5.1.2 Carbonyls (TO-11)

The following MQOs were established in the QAPP for this method:

- Recovery (formaldehyde): 50-150 percent
- Precision: ± 20 percent relative standard deviation (RSD)

- Completeness: >90 percent

Four samples (including three raw LFG samples and one field blank) were submitted to Resolution Analytics for formaldehyde and acetaldehyde determination. Results were reported in RFA# 992014. The report included information on instrument calibration and internal QC checks. Samples collected on October 31 and November 2, 2002 were received by the laboratory on November 14, 2002 and analyzed on November 22, 2002. This met the 30-day hold-time limitation.

Analytical detection limits were reported as 13 ppb for formaldehyde and 9 ppb for acetaldehyde in the extract. With an extract volume of 5 ml and sample gas volume of about 31 standard liters, the MDLs were 1.7×10^{-3} and 2.3×10^{-3} ppmv for formaldehyde respectively.

The field blank did not have detectable levels of acetaldehyde and showed 0.073 μ g formaldehyde detected. To assess accuracy, an external performance evaluation audit sample containing 0.25 ppm formaldehyde and acetaldehyde was analyzed with the sample set. Recovery was 101.6 percent% for formaldehyde and 96.3 percent for acetaldehyde, which meets the 50-150 percent MQO. One project sample was injected in duplicate and the percent drift (%D) range for formaldehyde was 0.7 percent and for acetaldehyde was 3.2 percent. All MQOs were met for this method for a completeness of 100 percent.

The test samples produced very low detection responses for formaldehyde. Therefore, even though the detected levels of formaldehyde were higher than formaldehyde's MDL, the reported concentrations for formaldehyde should be flagged as estimates and notated with a "J".

5.1.3 Hydrogen Sulfide (H₂S) (EPA Method 11)

The following MQOs were established in the Landfill A QAPP for this method:

- Accuracy: ± 5 percent bias
- Precision: ± 5 percent relative standard deviation (RSD)
- Completeness: >90 percent

Three collected samples, a reagent field blank, and two laboratory in-house reagent blanks were submitted to Oxford Laboratories for H₂S analysis by EPA Method 11. The samples were collected on November 2, 2002, and submitted to the laboratory on November 14, 2002. The results report was dated November 22, 2002. Therefore, the analysis met the 30-day hold time criteria.

The field blank submitted did not have quantifiable concentrations of H₂S. A laboratory spike was performed and the recovery was 101 percent. The three test samples produced results of similar concentrations. Duplicate analysis of the Rn#2 sample resulted in 1.7 percent relative standard deviation (RSD). All MQOs were met for this method for a completeness of 100 percent.

5.1.4 Dioxins and Furans (PCDD/PCDFs) (EPA Method 23/0011)

The following MQOs were established in the QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

Four sample sets (including one set of reagent blank and sample train rinsates) were submitted to ALTA Analytical Perspectives for PCDD/PCDF analysis. The samples were collected on November 1, 2002, and delivered to the laboratory on November 14, 2002. The samples were extracted on November 20, 2002 and analyzed on November 27, 2002. That met the 14-day hold-time for extraction and 40-day hold time for analysis.

The field blank did not have detectable levels of the target analytes. Detection limits for the various congeners were in the single-digit picogram level. To assess accuracy, each sample train was spiked with standard Method 23 spiking compounds and analysis of the samples yielded extraction standard (ES) recovery from 84 to 99 percent. Recovery of sampling standards (SS) ranged from 106 to 108 percent. These recoveries were well within the 50-150 percent MQO.

Because a decision was made to analyze only one of the three sample extracts, the completeness goal of 90% was not achieved. However, all other MQOs were met for this method.

5.1.5 Polycyclic Aromatic Hydrocarbons (PAHs) (EPA Method 23/0011)

5.1.5.1 Raw Landfill Gas (LFG) Samples

The Method 23 samples collected from the raw LFG could not be concentrated below 750 to 1000 µL. The produced cleaned up extracts contained gasoline-like hydrocarbons and prevented the preparation of final extracts for PAH analysis.

Therefore the MQOs for this sample group was 0 percent complete.

5.1.5.2 Engine Stack Samples

The following MQOs were established in the QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

Four samples (including one reagent blank) collected from the engine stack were submitted to ALTA Analytical Perspectives for PAH analysis. The report included information on instrument calibration and internal QC checks. Samples collected on November 1, 2002 were received by the laboratory on November 14, 2002. These were extracted on November 20, 2002 and analyzed on January 9, 2003. That met the 14-day hold-time for extraction but missed the analysis 40-day hold time by 10 days. The data were reported with the appropriate notations.

Analysis of the field blank yielded detectable but low levels of a few of the target compounds with all PAH analytes totaling to 15762 ng. In contrast, the test samples showed total PAH level of 113974 ng. Recovery of ES ranged from 65 to 124 percent. Recoveries of SS, d₁₀-fluorene and d₁₄-terphenyl were not reported. Recovery of the alternative standard (AS) d₁₀-anthracene was 57.9 percent. The reported recoveries were within the 50 to 150 percent MQO.

Because a decision was made to analyze only one of the three sample extracts, the completeness goal of 90% was not achieved. However, all other MQOs were met for this method.

5.1.6 Polychlorinated Biphenyls (PCBs)

The same Method 23 samples collected from the raw LFG were earmarked for analysis for PCBs. Since the cleaned up extracts could not be concentrated below 750 to 1000 μL because of the presence of gasoline-like hydrocarbons, final extracts could not be prepared for the planned PCB analysis. Therefore the MQO for this sample group was 0 percent complete.

5.1.7 Non-Methane Organic Compounds (NMOCs) (Method 25C)

The following MQOs were established in the QAPP for Landfill A:

- Recovery: 50 to 150 percent
- Precision: ± 30 percent RSD
- Completeness: >90 percent

Four canister samples (including a field blank) were submitted from Landfill A for NMOC analysis by Method 25-C to Triangle Environmental Services. The samples were collected on November 2, 2002, submitted on December 3, 2002, and analyzed between December 3 and 23, 2002. Therefore the analysis did not meet the 30 day hold time requirements. The apparent delay in sample delivery was partly attributed to the fact that the same canisters had to be analyzed by RTP Laboratory for volatile organics first. The impact of exceeding the prescribed 30-day hold time by up to 21 days is unknown. The laboratory report included information on instrument calibration and internal QC checks.

The only detected NMOC in the field blank was at 2 ppmv as hexane. Accuracy for the method was assessed by evaluating results of response factor (RF) check samples that were run prior to and following sample analysis. Acceptance criteria established by the method is that the RF must be within 10 percent of the response factor from initial calibration. All response factor checks ranged from 0.9 to 7.4 percent of the initial calibration, well within the 10 percent acceptance criteria. The %D between the pre and post-test checks were less than 2 percent, ranging from 0.5 to 1.2 percent. Samples were run in triplicate and all %RSDs for samples were less than 3.4 percent.

All MQOs were met for this method for a completeness of 100 percent. The reported data were notated for the hold time exceedance.

5.1.8 Hydrogen Chloride (HCl) (EPA Method 26A)

The following MQOs were established in the QAPP for Landfill A:

- Accuracy: ± 10 percent bias
- Precision: ± 10 percent RSD
- Completeness: > 90 percent

Four samples (including one field blank) were submitted to Resolution Analytics for HCl and chlorine (Cl_2) determination. The results were reported in RFA# 992014. The report included information on instrument calibration and internal QC checks. Samples were collected on October 31 and November 2, 2002. These were received by the laboratory on November 14, 2002, and analyzed on November 27, 2002, which met the 4 week hold-time requirement. Analytical detection limits were reported as 0.41 ppm HCl.

The field blank did not contain detectable levels of HCl. In-house audit samples were analyzed with each respective group of field samples and the measured concentrations fell within method criteria of 10 percent of their expected values.

A matrix spike was performed on Sample #1 (A POSST-01). A 0.8 ml sample was spiked with 0.8 ml of standard (50 ppm chloride) and analyzed in duplicate. The laboratory reported 97.1 percent recovery of the HCl spike with a 0.02 percent deviation in duplicate injections. This meets the MQO of ± 10 percent with very good precision. Calculated bias for internal QC check was < 2.2 percent. All MQOs were met for 100 percent completeness.

5.1.9 Metals (EPA Method 29)

The following MQOs were established in the Landfill A QAPP for this method:

- Accuracy: ± 25 percent bias
- Precision: ± 20 percent RSD
- Completeness: > 90 percent

Four sets of Method 29 Multi-Metals trains (including one field blank) were submitted to First Analytical Laboratories for As, Cd, Cr, Pb, Mn, Hg, and Ni determination. Results were reported in Project #21110. The report included information on instrument calibration and internal QC checks. Samples were collected on October 31 and November 2, 2002, received by the laboratory on November 12, 2002, and analyzed on November 14, 2002, which met the 14 day hold-time requirement. Method detection limits for each of the target metals were reported as follows:

- As = 5.0 µg/L
- Cd = 0.2 µg/L
- Cr = 5.0 µg/L
- Pb = 5.0 µg/L
- Mn = 5 µg/L
- Ni = 10 µg/L
- Hg = 0.2 µg/L

Traces of Cr, Mn and Ni were found in the blanks, which is not unusual.

All samples were spiked prior to analysis. Spike recoveries ranged from 82 to 110 percent and were within the acceptable range of 75-125 percent. In addition to spiking the samples, for each metal, internal calibration verification samples (ICVs) and continuing calibration verification samples (CCVs) were performed. ICVs were run at the beginning of each run set and CCVs were run at a frequency of one for every 10 samples. ICV and CCV measured values were all $< \pm 10$ percent for all metals. Therefore the MQO for this measurement was 100 percent and met the objective set in the QAPP.

5.1.10 Organo-Mercury (Hg) and Total Mercury (Hg) (Frontier)

The following MQOs were established in the Landfill A QAPP for this method:

- Recovery: 50-150 percent

- Precision: ± 20 percent RSD
- Completeness: >90 percent

Mercury (Hg) analysis was performed by Frontier Geosciences. Four total Hg samples (including a field blank) were taken at Landfill A. Samples were collected on November 1 and 2, 2002 and analyzed in December 2002. That analysis schedule exceeded the 14-day hold-time specified in the QAPP. All other quality assurance measures indicated that the analysis of the traps were under good control. All field blanks were consistent with historical values and indicate the detection limit is likely to be at or below the previous estimated value of 50 ng/m^3 . Spike recoveries were 95.4 and 95.2 percent and relative percent difference (RPD) between replicates was 6.2 percent, which meets MQOs and are therefore 100 percent complete.

Five monomethyl mercury (MMHg) samples (including a field blank and field spike) were collected on November 2, 2002. These samples were analyzed December 2005 which exceeded the 14-day hold-time. Analysis of these samples was under good control with acceptable distillation spike recoveries and distillation duplicates. All CCV standards had acceptable recoveries. Field spike recovery was 75 percent and matrix spike recovery was 122 percent, which meets MQOs. The only prominent incoherency of the MMHg data from Landfill A is the disagreement among the replicates. Samples 021102-01 and 021102-02 had measured concentrations below the estimated method detection limit but sample 021102-03 was reported at a concentration of 1.2 ng/m^3 . This does not meet the ± 30 percent RSD criteria for replicate samples. Possible explanations for the differences between replicates include variability in the landfill gas concentration or undetected sampling or analytical error. The data were notated accordingly.

Five dimethyl mercury (DMHg) samples (including a field blank and field spike) were collected on November 1 and 2, 2002. These samples were analyzed in December 2002 and did not meet the 14-day hold-time. Field spike recoveries for all DMHg analysis were consistently low 0-40 percent. Because of recovery issues, DMHg concentrations are likely biased low and the degree of bias is likely significant. QA measures in place support the following conclusions:

- Replicate samples taken at each site reported similar concentrations which indicated that the properties of the DMHg sampling train and landfill gas were consistent and biases was not attributable to trap media or landfill sample gas.

- Continuous calibration verifications (CCVs) used during the analysis indicates that the detection systems were measuring accurately.
- Dimethyl Hg (DMHg) field blanks indicated that the trap media, handling procedures and analytical techniques did not contribute to the problems with recovery.
- Trip spikes (traps spike in the laboratory, shipped to the field but not used for sampling) indicated that the laboratory standards, trap media and trap handling procedures do not create significant bias.
- Field spikes (traps spiked in the lab and used to collect a replicate sample) indicated that some property or action during sampling either destroyed or evaded the DMHg adsorbed to the Carbotrap

The RSD between the three replicate samples was 23.9 percent, which meets the MQO of ± 30 percent, but because recovery MQOs were not met for any of the field spikes, DMHg analysis was 0 percent complete. The data were reported with the appropriate notations.

5.1.11 Volatile Organic Compounds (VOCs) and Methane (CH₄) (Method TO-15)

The following MQOs were established in the Landfill A QAPP for this method:

- Accuracy: 50-150 percent recovery
- Precision: ± 30 percent RSD
- Completeness: >90 percent

Four SUMMA canisters (including one field blank) were submitted from Landfill A to RTP Laboratories for VOC and CH₄ determination by EPA Method TO-15. Results were reported in Project #347-02. Samples were collected on November 2, 2002 and analysis was completed by November 27, 2002, which met the 30 day hold-time requirement.

Analysis of the field blank found 3.3 ppbv of acetone, 1.4 ppbv of methylene chloride, and 1.03 ppbv of bromomethane. Other targets were either found at <1 ppbv or not detected at the MDL of 0.2 ppb.

Accuracy was assessed using results of a 10 ppbv laboratory control sample containing all target compounds. For all but two compounds, recoveries ranged from 60-150 percent, which met the established acceptance criteria of 50-150 percent. The recovery reported for ethanol was 2.4 percent, and 230 percent for m/p-xylene. Results for these two compounds should be flagged as estimated (“J”).

Sample 062205-04 was spiked with 200 ppbv of chlorobenzene prior to dilution with helium and analysis. The recovery of chlorobenzene was 89.5 percent.

Precision was demonstrated through multiple injections of standards at five concentration levels. The RSD between the calculated relative response factors (RRF) must be <30% with allowances that two may be >40 percent. The average RSD was 13.8 percent and method criteria were met for all compounds except isopropyl alcohol with an RSD of 56.3 percent and hexane with an RSD of 40.7 percent. Results for these compounds should be flagged as estimated (“J”). Valid data was received for all SUMMA canisters submitted, and these analyses were considered to be 100 percent complete.

5.2 Audits

This project was designated as QA Category II effort. Hence, audits were required. The internal and external audits performed for this project were completed earlier and their findings were included in a separate report for Landfill D of this project.

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**Field Test Measurements at Five Municipal Solid
Waste Landfills with Landfill Gas Control Technology
Final Report**

Appendix B
SOURCE TEST REPORT
FOR LANDFILL B

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- I. Method 23 (PAH)
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- L. Method 29 (Metals)
- M. Method 26A (HCl)
- P. Raw Field Data Records
- Q. CEM Calibration Records and Span Gas Certification
- R. Sampling Control Meter Boxes Calibration Record

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Acronym List

%D	Percent drift
AP-42	Compilation of Air Pollutant Emission Factors
APPCD	Air Pollution Prevention Control Division
ARCADIS	ARCADIS G&M, Inc.
As	Arsenic
AS	Alternative standard
CCVs	Continuing calibration verification samples
Cd	Cadmium
CEMS	Continuous emission monitoring system
CH ₄	Methane
Cl ₂	Chlorine
CO	Carbon monoxide
CO ₂	Carbon dioxide
Cr	Chromium
DMHg	Dimethyl mercury
EPA	US Environmental Protection Agency
ES	Extraction standard
FID	Flame ionization detector
GC	Gas chromatograph
GC/FID	Gas chromatograph/flame ionization detector
GC/MS	Gas chromatograph/mass spectrometer
HCl	Hydrogen chloride
Hg	Mercury
H ₂ S	Hydrogen sulfide
ICVs	Internal calibration verification samples
LFG	Landfill gas
MMHg	Monomethyl mercury
Mn	Manganese

MQOs	Measurement quality objectives
MSW	Municipal solid waste
N ₂	Nitrogen
Ni	Nickel
NMOCs	Non-methane organic compounds
NO _x	Nitrogen oxides
O ₂	Oxygen
PAHs	Polynuclear aromatic hydrocarbons
Pb	Lead
PCBs	Polychlorinated biphenyls
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality control
RF	Response factor
RPD	Relative percent difference
RRF	Relative response factors
RSD	Relative standard deviation
RTP	Research Triangle Park
SO ₂	Sulfur dioxide
SS	Sampling standards
TCDD/TCDFs	Dioxins/furans
THCs	Total hydrocarbons
TICs	Tentatively identified compounds
VOCs	Volatile organic compounds

1. Introduction

Large municipal solid waste (MSW) landfills are subject to Clean Air Act regulations because of concerns related to their emissions and their potential adverse effects to human health and the environment. Landfills are listed as a source of air toxics in the Urban Air Toxics Strategy for future evaluation of residual risk. Existing emission factors for landfill gas (LFG) were largely developed using data from the 1980s and early 1990s. A database was developed summarizing data from approximately 1,200 landfills, along with emissions information from literature, and from test reports prepared by state and local government agencies and industry. These data were summarized in *Compilation of Air Pollutant Emission Factors (AP-42)*, Chapter 2.4. The final rule and guidelines are contained in 40 CFR Parts 51, 52, and 60, *Standards of Performance for New Stationary Sources and Guidelines for Control of Existing Sources: Municipal Solid Waste Landfills*.

The overall purpose of this testing program was to generate data that may be used to update AP-42 and to include data that reflect current waste management operating practices.

This report presents the results of a field test conducted at the Landfill B located in the northeast U.S. Testing took place on November 4 and 5, 2002.

The site used an enclosed flare for destruction of the LFG. A more detailed description of the flare system is presented in Section 2. The specific purpose of the testing program was to determine emissions from the LFG pipe feeding the enclosed flare and from the flare stack. The pollutants of interest for the raw untreated LFG were volatile organic compounds (VOCs), non-methane organic compounds (NMOCs), hydrogen sulfide (H₂S), carbonyls (acetaldehyde, formaldehyde), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and mercury (Hg) compounds. The pollutants of interest for the treated LFG, in this case at the enclosed flare stack, were carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), NMOCs as total hydrocarbons (THCs), hydrogen chloride (HCl), dioxins/furans (PCDD/PCDFs), PAHs, total Hg, and metals.

ARCADIS G&M, Inc. (ARCADIS), as contractor to the US Environmental Protection Agency's (EPA) Air Pollution Prevention Control Division (APPCD), performed this work under Work Assignment 4-1 of Onsite Laboratory Support Contract. The testing activities followed the specifications of the approved "*Site-Specific Quality Assurance Project Plan for the Field Evaluations of Landfill Gas Control Technologies Landfill B*" dated October 29, 2002.

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2. Landfill Facility Descriptions

Available information indicated that Landfill B began operation in 1967. As of 2003, the site had 4,000,000 tons of waste in place, over an area of 40 acres. Raw LFG was collected through 2,500 feet of horizontal collectors. The gases generated in the landfill were extracted with 49 vertical wells. All collected LFG was piped to the enclosed flare system and combusted.

2.1 Flare Process Description and Operation

A Perennial Energy Enclosed Ground Flare Station, rated at maximum LFG input rate of 1500 scfm, received and destroyed the collected LFG. Figure 2-1 shows a simplified process schematic of the flare system. A burner array and an automatic louvre system controlled gas and combustion air distribution to achieve proper combustion. A condensate removal system prevented liquids from entering into the flare burners. A flame arrestor prevented flame from propagating from the burner array back into the LFG collection and flow control system. The unit could be operated satisfactorily within a 5-to-1 turndown ratio (from 54.0 to 10.8 MMBtu/hr). The system did not have provisions for heat recovery.

According to manufacturer information, the Perennial Energy Enclosed Ground Flare Station was designed to afford the combustion gases a minimum residence time of 0.6 seconds at 1400°F to insure thermal destruction of CO and hydrocarbons, with minimal production of NO_x. Specific information related to the system's ability to destroy or reduce other potential pollutants was not available.

2.2 Landfill Gas (LFG) Sampling Locations

Gas sampling was conducted at the raw LFG pipe and at the Perennial Energy Enclosed Ground Flare stack, as depicted in Figure 2-1.

2.2.1 Landfill Gas (LFG) Header Pipe

Raw LFG samples were collected from the header pipe at the point where it emerged from the ground and upstream of any processing units. Figure 2-2 is a photograph of the raw LFG pipe. The pipe was 11 inches in diameter as it emerged from the ground and expanded to 14 inches in diameter before passing through a wall into the building that housed the gas control-and-process system. At the sampling point, four ¼-inch gas

taps were installed, and gases were withdrawn through these ports to obtain the test samples.

Comparing the physical arrangement of this header pipe with requirements of standard sampling methodologies indicated that the header configuration rendered isokinetic sampling at the gas collection pipe impossible. Therefore, isokinetic sampling was not attempted at this location. Further discussions on this topic are presented in Section 3.3.1.1.

2.2.2 Flare Stack

Figure 2-3 shows the flare stack and the arrangement of the sampling ports. The flare stack was 118 inches in diameter and has four 4-inch sampling ports installed 90 degrees apart. Figure 2-4 is a schematic of the flare stack and includes the locations of the sample traverse points. Isokinetic sampling was possible at this location.

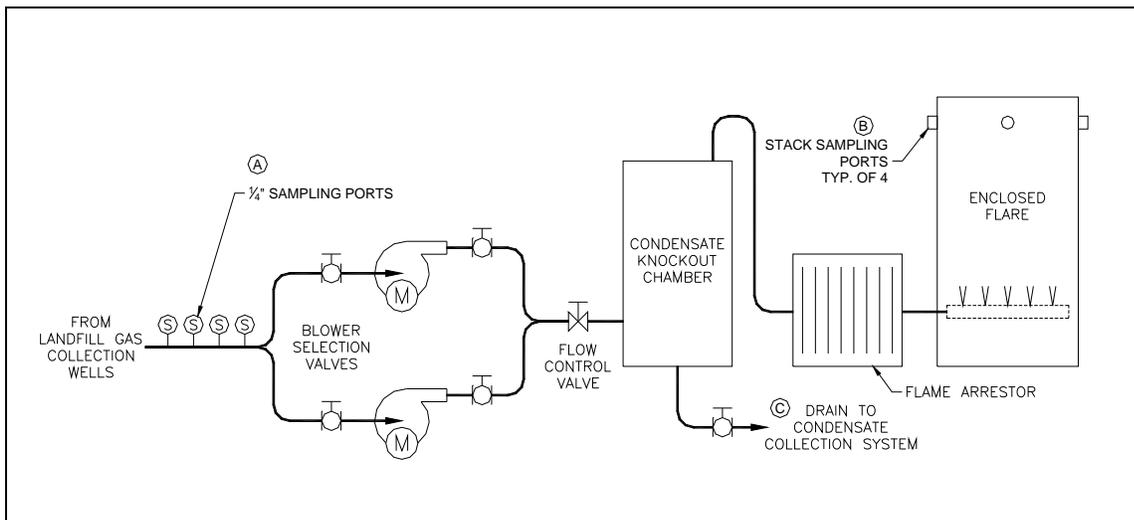


Figure 2-1. Simplified Flare Process Flow Diagram and Sampling Points



Figure 2-2. Landfill Gas Collection Pipe



Figure 2-3. Enclosed Flare Unit Showing Stack Sampling Ports

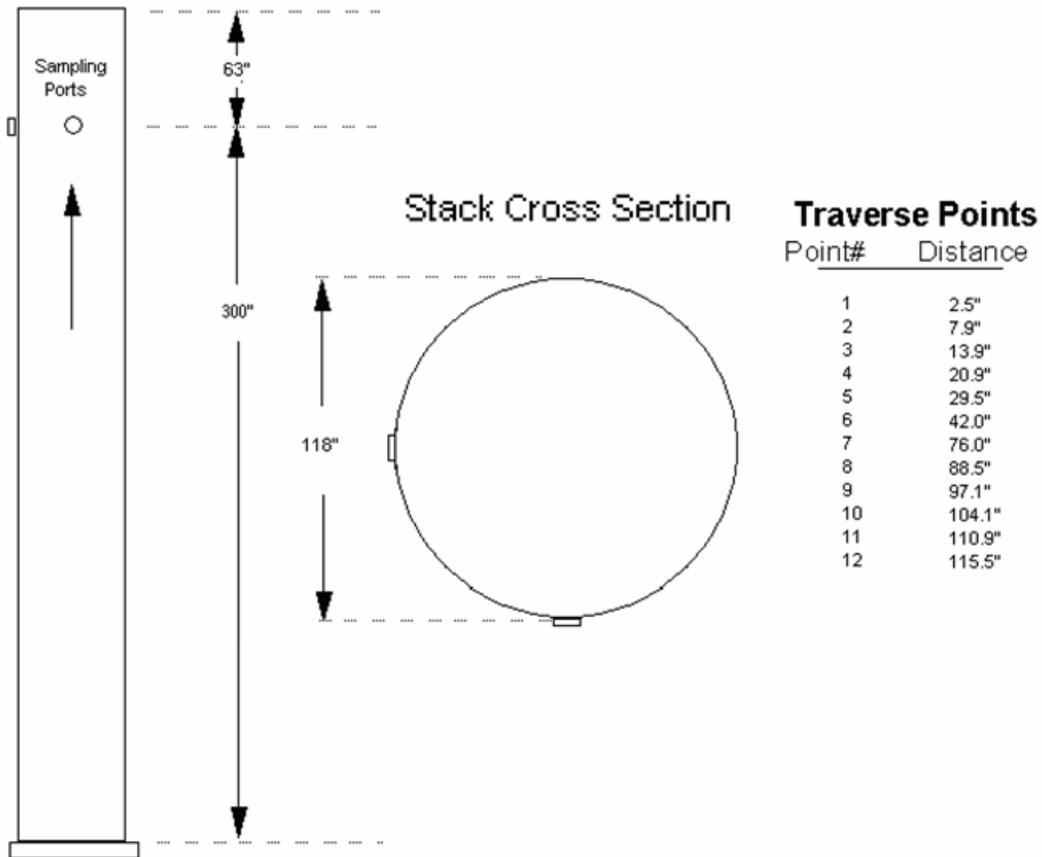


Figure 2-4. Flare Stack Dimension and Sampling Traverse Locations

3. Test Operations

As stated previously, the purpose of the sampling program was to determine the chemical constituents of raw LFG and flare stack emissions.

3.1 Test Team

The tests were conducted by a team of eight individuals and a representative of the landfill company. The team members and their primary duties are listed in Table 3-1.

Table 3-1. Test Team Members and Responsibilities

Role	Primary Duty
Test Engineer	Chief
Technician	CEM operator
Technician	Sample train preparation and recovery
Technician	Sample train operator at raw LFG inlet pipe
Test engineer	Sample train operator at stack
Technician	Sample train operator at stack
Test engineer	Mercury measurements
Air Programs Manager	Observer

3.2 Test Log

3.2.1 Planned Test Sample Matrices

The target list of samples and measurements to be collected were specified in the Quality Assurance Project Plan (QAPP) dated October 29, 2002. These are reiterated here for completeness. Tables 3-2 lists the target compounds of interest for the raw LFG. Table 3-3 lists the target compounds of interest for the treated gas at the flare stack.

3.2.2 Landfill Gas (LFG) Pipe (Inlet)

Sample collection took two days to complete. Table 3-4 lists the samples that were collected from the raw LFG pipe. Figure 3-1 is a photograph of the sampling team in action at this sample location.

Table 3-2. Target Analytes for the Landfill Gas Stream and Sample Condensate Collected at the Gas Header

Volatile compounds	Volatile compounds (continued)	Carbonyls
Methane	Ethylene dibromide	Acetaldehyde
Ethane	Ethylene dichloride	Formaldehyde
Propane	Methyl chloroform	
Butane	Methyl isobutyl ketone	Polycyclic aromatic hydrocarbons
Pentane	Methylene chloride	
Hexane	Propylene dichloride	Polychlorinated biphenyls
Carbonyl sulfide	t-1,2-Dichloroethene	
Chlorodifluoromethane	Tetrachloroethene	Mercury
Chloromethane	Toluene	Organo-mercury compounds
Dichlorodifluoromethane	Trichlorethylene	Total
Dichlorofluoromethane	Vinyl chloride	Elemental
Ethyl chloride	Vinylidene chloride	
Fluorotrichloromethane	Ethanol	Gases
1,3-Butadiene	Methyl ethyl ketone	Carbon dioxide
Acetone	2-Propanol	Oxygen
Acrylonitrile	1,4-Dichlorobenzene	
Benzene	Ethylbenzene	Moisture
Bromodichloromethane	Xylenes	
Carbon disulfide		
Carbon tetrachloride		
Chlorobenzene	Non-methane organic carbons	
Chloroform		
Dimethyl sulfide	Reduced sulfur compounds	
Ethyl mercaptan	Hydrogen sulfide	

Table 3-3. Target Analytes for the Flare Stack Outlet Gas Stream

Gases	Dioxins/Furans
Oxygen	
Carbon dioxide	PAHs
Carbon monoxide	
Nitrogen oxide	Mercury
Sulfur dioxide	Total
Total hydrocarbons	
Non-methane organic compounds	Metals
	Lead, arsenic, cadmium, chromium, manganese, nickel
Hydrogen chloride	



Figure 3-1. Sampling Operations at the Landfill Gas Pipe Inlet

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Table 3-4. Landfill Gas Inlet Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 40 (TO-15, 25C, 3C)					
	B-Pre-M40-110402-01	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	11/04/02	11:02 - 11:16
	B-Pre-M40-110402-02	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	11/04/02	12:13 - 12:24
	B-Pre-M40-110402-03	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	11/04/02	13:21 - 13:34
EPA Method 23					
	B-Pre-M23-110402-01	PAHs, PCBs	Test	11/04/02	12:41 - 15:41
	B-Pre-M23-110402-02	PAHs, PCBs	Test	11/04/02	12:42 - 15:42
	B-Pre-M23-110502-03	PAHs, PCBs	Test	11/05/02	09:38 - 12:41
EPA Method 0100					
	B-Pre-M0100-110502-01	Carbonyls	Test	11/05/02	09:48 - 10:28
	B-Pre-M0100-110502-02	Carbonyls	Test	11/05/02	10:45 - 11:15
	B-Pre-M0100-110502-03	Carbonyls	Test	11/05/02	11:27 - 11:58
EPA Method 11					
	B-Pre-M0011-110502-01 ^a	H ₂ S	Test	11/05/02	12:51 - 13:01
	B-Pre-M0011-110502-02	H ₂ S	Test	11/05/02	13:22 - 13:32
	B-Pre-M0011-110502-03	H ₂ S	Test	11/05/02	14:20 - 14:30
	B-Pre-M0011-110502-04	H ₂ S	Test	11/05/02	14:58 - 15:08
Lumex Instrument					
	B-Pre-EM-110502-01	Elemental Hg ^b	Test	11/05/02	16:35 - 17:00
	B-Pre-EM-110502-02	Elemental Hg ^b	Test	11/05/02	16:35 - 17:00
	B-Pre-EM-110502-03	Elemental Hg ^b	Test	11/05/02	16:35 - 17:00
Frontier					
	B-Pre-TGM-110402-FB01	Total gaseous Hg	Field Blank	11/04/02	13:22 - 13:25
	B-Pre-TGM-110402-01	Total gaseous Hg	Test	11/04/02	10:52 - 11:32
	B-Pre-TGM-110402-02	Total gaseous Hg	Test	11/04/02	11:44 - 12:21
	B-Pre-TGM-110402-03	Total gaseous Hg	Test	11/04/02	12:33 - 13:11

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
Frontier					
	B-Pre-MMM-110502-SP01	Monomethyl Hg	Spike	11/05/02	10:41 - 11:07
	B-Pre-MMM-110502-FB01	Monomethyl Hg	Field Blank	11/05/02	8:30 - 8:35
	B-Pre-MMM-110502-01	Monomethyl Hg	Test	11/05/02	08:43 - 08:58
	B-Pre-MMM-110502-02	Monomethyl Hg	Test	11/05/02	09:22 - 09:46
	B-Pre-MMM-110502-03	Monomethyl Hg	Test	11/05/02	10:02 - 10:27
Frontier					
	B-Pre-DMM-110502-SP01	Dimethyl Hg	Spike	11/05/02	15:40 - 16:02
	B-Pre-DMM-110502-FB01	Dimethyl Hg	Field Blank	11/05/02	16:15 - 16:20
	B-Pre-DMM-110502-01	Dimethyl Hg	Test	11/05/02	13:42 - 14:07
	B-Pre-DMM-110502-02	Dimethyl Hg	Test	11/05/02	14:22 - 14:50
	B-Pre-DMM-110502-03	Dimethyl Hg	Test	11/05/02	15:00 - 15:28

^a Did not purge train at end of run; run was repeated

^b Represents average of 3 readings, each of 30-second duration

3.2.3 Flare Stack

Sampling at the flare stack was conducted by accessing the sampling ports with the aid of a scaffold. Figure 3-2 shows the flare and the sampling scaffold platform. Figure 3-3 shows one of the sampling ports with a sampling probe in place during sample collection.

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Figure 3-2. Sampling Operations at the Enclosed Flare



Figure 3-3. Sampling Port with Probe in Place

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The flare stack was sampled for NMOCs (as THC), PCDD/PCDFs, PAHs, HCl, metals (lead [Pb], arsenic [As], cadmium [Cd], chromium [Cr], manganese [Mn], nickel [Ni]), total Hg, SO₂, NO_x, CO, carbon dioxide (CO₂), and oxygen (O₂). Table 3-5 lists the test samples that were collected from the flare stack.

The flare stack cross-section was divided into 24 equal areas according to EPA Method 1. Sampling at the flare stack was conducted at isokinetic conditions. Sample collection times for the Method 26 HCl train and Method 29 metals train were 60-minutes. Run time for the Method 23 PCDD/PCDFs trains was 180 minutes. Run time for continuous emission monitoring system (CEM) parameters (SO₂, NO_x, CO, O₂, CO₂, and THC) varied due to the CEM sampling system developing problems shortening the useable measurement periods

Table 3-5. Flare Stack Test Sample Log and Collection Times

	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 3A (CEM) ^b					
	B-Post-M3A-110402-01	O ₂	Test	11/04/02	12:10 - 17:45
	B-Post-M3A-110502-02	O ₂	Test	11/05/02	13:15 - 14:45
EPA Method 3A (CEM) ^b					
	B-Post-M3A-110402-01	CO ₂	Test	11/04/02	12:10 - 17:45
	B-Post-M3A-110502-02	CO ₂	Test	11/05/02	13:15 - 14:45
EPA Method 10 (CEM) ^b					
	B-Post-M10-110402-01	CO	Test	11/04/02	12:10 - 17:45
	B-Post-M10-110502-02	CO	Test	11/05/02	13:15 - 14:45
EPA Method 7E (CEM) ^b					
	B-Post-M7E-110402-01	NO _x	Test	11/04/02	12:10 - 17:45
	B-Post-M7E-110502-02	NO _x	Test	11/05/02	13:15 - 14:45
EPA Method 6C (CEM) ^b					
	B-Post-M6C-110402-01	SO ₂	Test	11/04/02	12:10 - 17:45
	B-Post-M6C-110502-02	SO ₂	Test	11/05/02	13:15 - 14:45
EPA Method 25A (CEM) ^b					
	B-Post-M25A-110402-01	NMOCs (THC)	Test	11/04/02	12:10 - 17:45
	B-Post-M25A-110502-2	NMOCs (THC)	Test	11/05/02	13:15 - 14:45

**Source Test
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	Run Number	Analyte(s)	Sample Class	Date	Run Period
Lumex Instrument					
	B-Post-EM-110502-01	Elemental Hg ^a	Test	11/05/02	16:10 - 16:35
	B-Post-EM-110502-02	Elemental Hg ^a	Test	11/05/02	16:10 - 16:35
	B-Post-EM-110502-03	Elemental Hg ^a	Test	11/05/02	16:10 - 16:35
	B-Post-EM-110502-04	Elemental Hg ^a	Test	11/05/02	16:10 - 16:35
EPA Method 26A					
	B-Post-M26-110402-01	HCl	Test	11/04/02	17:05 - 18:19
	B-Post-M26-110402-02	HCl	Test	11/04/02	17:07 - 18:21
	B-Post-M26-110502-03	HCl	Test	11/05/02	14:03 - 15:15
EPA Method 23					
	B-Post-M23-110402-01	Dioxins/furans, PAHs	Test	11/04/02	12:30 - 15:39
	B-Post-M23-110402-02	Dioxins/furans, PAHs	Test	11/04/02	12:31 - 15:41
	B-Post-M23-110502-03	Dioxins/furans, PAHs	Test	11/05/02	09:40 - 12:51
EPA Method 29					
	B-Post-M29-110402-01	Metals	Test	11/05/02	09:40 - 10:53
	B-Post-M29-110402-02	Metals	Test	11/05/02	11:29 - 12:42
	B-Post-M29-110502-03	Metals	Test	11/05/02	14:05 - 15:17

^a Represents average of 3 readings, each of 30-second duration

^b The CEM sampling system developed problems and cut short the useable measurement periods.

3.3 Field Test Changes and Deviations from Quality Assurance Project Plan (QAPP) Specifications

3.3.1 Variation from Test Methods or Planned Activities

3.3.1.1 Sampling at the Landfill Gas (LFG) Inlet Pipe

Because of the configuration of the raw LFG inlet pipe, isokinetic sampling at this location was not possible or attempted. The gas collection pipe was 11 inches in diameter and had a continuous curvature (Figure 2-2). Furthermore, the pipe diameter changed to 14 inches abruptly near the 1/4-inch sampling port, most likely introducing additional undesirable flow disturbances. As such, the pipe did not have sufficient

straight lengths of pipe-run upstream and downstream of the sample ports. The lack of straight-run pipe precluded accurate velocity measurements.

Isokinetic sampling would be of value if particulate sampling was needed. Little particulate matter was expected in the raw LFG and this was confirmed by the observation of glass fiber filters on several of the sampling trains that did not reveal particulate catch.

3.3.1.2 Landfill Gas (LFG) Inlet Pipe Condensate Sample

The raw LFG inlet pipe condensate sample was not collected because it was not a part of the QAPP-specified samples.

3.3.1.3 Landfill Gas (LFG) Flow Rate Measurement

LFG flow rates were recorded as indicated by the Perennial Energy Enclosed Ground Flare Station control panel. The accuracy of the flow rates indicated measurement could not be independently verified because of the inability to measure gas velocity accurately, as discussed in the previous section. The test team was only able to make crude velocity measurements by traversing the pipe using a standard pitot probe. The accuracies of these measurements were uncertain, even though they appeared to be similar to the facility's flow rate readings.

3.3.2 Application of Test Methods

The sampling and, where applicable, analytical methods used in this test program follow those specified in the QAPP. Table 3-6 lists the applicable measurement and analyses methods and their corresponding performing organizations.

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Table 3-6. Test Methods and Performing Organizations

Procedure	Description	Organization Performing Analysis
EPA Method 1	Selection of traverse points	ARCADIS G&M
EPA Method 2	Determination of stack gas velocity and volumetric flow rate	ARCADIS G&M
EPA Method 3A	Determination of oxygen (O ₂) and carbon dioxide (CO ₂) for flare stack gas molecular weight calculations	ARCADIS G&M
EPA Method 3C	Determination of carbon dioxide (CO ₂), methane (CH ₄), nitrogen (N ₂), and oxygen (O ₂) in raw LFG	Triangle Environmental Services
EPA Method 4	Determination of stack gas moisture	ARCADIS G&M
EPA Method 6C	Determination of sulfur dioxide (SO ₂)	ARCADIS G&M
EPA Method 7E	Determination of nitrogen oxides (NO _x)	ARCADIS G&M
EPA Method 10	Determination of carbon monoxide (CO)	ARCADIS G&M
EPA Method 11	Determination of hydrogen sulfide (H ₂ S)	Oxford Laboratories
EPA Method 23	Determination of dioxins/furans, PAHs, and PCBs	ALTA Analytical Perspectives
EPA Method 25A	Determination of flare stack gas NMOCs, as THCs when total organic concentration was less than the 50 ppm Method 25C applicability threshold	ARCADIS G&M
EPA Method 25C	Determination of raw LFG NMOCs	Triangle Environmental Services
EPA Method 26A	Determination of hydrogen chloride (HCl)	Resolution Analytics
EPA Method 29	Determination of metals	First Analytical Laboratories
EPA Method 40	Determination of VOCs	Research Triangle Park Laboratories
SW-846 Method 0100/TO-11	Determination of carbonyls (formaldehyde, acetaldehyde)	Resolution Analytics
LUMEX instrument	Determination of elemental mercury (Hg ⁰)	ARCADIS G&M
Organic mercury methods	Determination of raw LFG: Monomethyl mercury Dimethyl mercury Total mercury.	Frontier Geosciences

3.3.3 Test Method Exceptions

Laboratory analytical procedures followed those prescribed by the specified methods, with the following exceptions:

Raw Landfill at Inlet

- Carbonyls were analyzed by Method TO-11 instead of SW-846 Method 8315. (Method TO-11 and Method 8315 closely resemble each other.)
- Polycyclic aromatic hydrocarbons (PAHs) were analyzed by SW-846 Method 8270. The sample extracts were found to contain excessive amounts of non-PAH organics. In order to make the extracts safe to be injected into the gas chromatograph/mass spectrometer (GC/MS), the sample had to be diluted excessively. The high dilution made the method detection limit (MDL) for the target PAHs too high, resulting in “non-detects” (ND) at the high detection limits. The planned analysis method could not produce the desired results at the needed detection levels. At the present time, an alternative analysis method was not identified. The sample extracts are in storage and may be submitted for analysis if a suitable method is available.
- Polychlorinated biphenyls (PCBs) were analyzed by EPA Method 1668 (EPA 812/R-97-001) as specified in the QAPP. However, similar to the difficulties experienced for the PAH analysis, in order to make the extracts safe to be injected into the gas chromatograph (GC), the sample had to be diluted excessively. The planned analysis method could not produce the desired results at the needed detection levels
- For raw LFG inlet samples, VOCs were analyzed by EPA Method TO-15. Methane (CH₄) was analyzed by GC/FID and additionally by Method 3C.

Flare Stack

- Non-Methane Organic Compounds (NMOCs) - Method 25A was used instead of the specifically applicable Method 25C. This was necessitated by the low overall organic compound concentrations in the flare stack gas, which were significantly below the Method 25C's applicability threshold minimum level of 50 ppmv.

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4. Presentation of Test Results

Testing took place at the Landfill B on November 4-5, 2002. Results of the testing are presented in this section, and detailed test results are included in the Appendices. The following subsections provide concise summaries of the test results.

4.1 Raw Landfill Gas (LFG) Pipe Results

As shown in Figure 2-2, sampling was conducted by extracting samples via the four ¼-inch ports installed in the raw LFG pipe.

4.1.1 Raw Landfill Gas (LFG) Flow Rate and Temperature

4.1.1.1 Direct Measurements

The facility process system had a flow measurement system, which displayed the flow rate on an instrument panel meter. The panel meter read a constant 1496% scfm. The “%” symbol in the display was indicative that the flow measurement system was over-ranged.

The small size of the sampling ports and lack of an adequately long straight pipe run upstream of the sampling ports precluded the proper measurement of the LFG velocity profile within this pipe. Nonetheless, attempted measurements with a velocity probe returned readings ranging from 1400 ft/min near the bottom (inside curve) of the pipe, to 5000 ft/min near the top (outside curve) of the pipe. Approximating the velocity, using the arithmetic average velocity of 3160 ft/min and pipe inside diameter of 10 inches, the volumetric flow rate was estimated to be about 1745 cu ft/min.

A direct measurement with thermocouples showed the raw LFG temperature to be 62°F.

4.1.1.2 Flow Rate Estimate by Stoichiometric Calculations

The volumetric flow rate of the raw LFG was estimated by using the measured volumetric flow rate of the flare stack exhaust, the composition of the flare stack exhaust gas (O₂ and CO₂ concentrations) and the composition of the raw LFG (organic constituents, CO₂, O₂, nitrogen [N₂], etc) to input into a stoichiometric computation algorithm. This approach resulted in an estimated raw LFG flow rate of about 1300 dscfm. A worksheet outlining the stoichiometric calculations is shown in Appendix O.

4.1.1.3 Landfill Gas (LFG) Flow Rate Combined Estimate

Based on the three independent sources of the flow rate estimates, 1496 scfm by the facility's flow rate indicator, 1745 scfm by the crude pitot probe measurement, and 1300 scfm by stoichiometric calculation, a reasonable combined estimate is 1500 scfm. Because the flow rate is an estimate, any mass emission rates calculated based on this raw LFG flow rate will also be recognized as estimates.

4.1.2 Raw Landfill Gas (LFG) Constituents

The concentrations of the constituents of interest in the raw LFG are presented in the following Subsections 4.1.2.1 through 4.1.2.5. Following the presentation of the constituent concentrations, Section 4.3 summarizes the data and presents a comparison with the AP-42 default values. This section also presents the estimated mass flow rates of the constituents at the raw LFG pipe.

4.1.2.1 Volatile Organic Compounds (VOCs)

Concentrations of VOCs were obtained collecting summa canister samples using Method 40 procedures. Analysis was performed by Method TO-15, with gas chromatography and mass spectrometry (GC/MS). The alkanes (C2 through C6), being present in much higher concentrations, were analyzed by GC flame ionization detection (FID) on the same summa canister samples.

Table 4-1 lists the results of these analyses. Tentatively identified compounds (TICs) can be seen in the Research Triangle Park (RTP) Laboratory reports in Appendix A.

4.1.2.2 Non-methane Organic Compounds (NMOCs)

Non-methane organic compounds (NMOCs) in the raw LFG were analyzed by Method 25C on the Method 40 samples. NMOC concentrations in the raw LFG are presented in Table 4-2. This table also includes the concentrations of CH₄, CO₂ and O₂, which are results obtained as part of the NMOC analyses. The moisture concentration data were obtained from the Method 23 PAH/PCB sample train measurements.

The other analytes, oxygen (O₂), carbon dioxide (CO₂), and moisture, are not pollutants but are of interest as they are useful indicators of the "quality" of the raw LFG. The concentrations of nitrogen (N₂) and O₂ are also indicators of the extent of ambient air infiltration into the LFG collection. Method 25C for NMOC determination specifically

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recommends that these measurements be made to determine potential air infiltration. Therefore, while measurements for methane (CH₄), CO₂, O₂, and N₂ by Method 3C were not included in the original QAPP, these measurements were included and performed.

Table 4-1. Raw Landfill Gas VOC Concentrations

Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
<u>By GC/FID</u>						
Ethane	ppmv	1	4.6	4.4	4.9	4.6
Propane	ppmv	1	6.0	5.7	5.9	5.9
Butane	ppmv	1	3.0	2.9	4.1	3.3
Pentane	ppmv	1	3.3	2.1	2.4	2.6
Hexane	ppmv	1	ND	ND	ND	ND
<u>By TO-15 GC/MS</u>						
Dichlorodifluoromethane (Freon 12)	ppbv	0.2	648	672	83	468
1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	ppbv	0.2	58	65	9	44
Chloromethane	ppbv	0.2	ND	217	ND	72
Vinyl chloride ^c	ppbv	0.2	560	585	86	410
1,3-Butadiene (Vinylethylene) ^c	ppbv	0.2	111	136	21	89
Bromomethane (Methyl Bromide) ^c	ppbv	0.2	39	46	52	46
Chloroethane (Ethyl Chloride)	ppbv	0.2	2660	2820	157	1880
Trichloromonofluoromethane (CFC11)	ppbv	0.2	417	488	77	327
1,1-Dichloroethene	ppbv	0.2	10	12	2	8
1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	ppbv	0.2	14	17	3	11
Carbon Disulfide	ppbv	0.2	155	214	32	134
Ethanol	ppbv	0.2	261	314	31	202
Isopropyl Alcohol (2-Propanol) ^c	ppbv	0.2	206	848	14	356
Methylene chloride (Dichloromethane) ^c	ppbv	0.2	163	156	186	169
Acetone ^c	ppbv	0.2	1900	2480	440	1610

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
t-1,2-dichloroethene	ppbv	0.2	11	14	2	9
Hexane	ppbv	0.2	1700	1770	2370	1950
Methyl-t-butyl ether (MTBE)	ppbv	0.2	221	254	54	177
1,1-Dichloroethane	ppbv	0.2	231	282	20	178
Vinyl Acetate	ppbv	0.2	598	1430	28	686
cis-1,2-Dichloroethene	ppbv	0.2	346	454	76	292
Cyclohexane	ppbv	0.2	862	1160	185	734
Chloroform	ppbv	0.2	205	325	41	190
Ethyl Acetate	ppbv	0.2	2130	2570	2240	2310
Carbon Tetrachloride	ppbv	0.2	6	9	1	5
Tetrahydrofuran (Diethylene Oxide)	ppbv	0.2	717	925	1000	882
1,1,1-Trichloroethane	ppbv	0.2	37	49	7	31
2-Butanone (Methyl Ethyl Ketone)	ppbv	0.2	1600	2210	484	1430
Heptane	ppbv	0.2	1240	1230	282	918
Benzene ^c	ppbv	0.2	312	373	69	251
1,2-Dichloroethane	ppbv	0.2	6.8	7	1	5
Trichloroethylene (Trichloroethene)	ppbv	0.2	129	151	28	103
1,2-Dichloropropane	ppbv	0.2	10	4	2	5
Bromodichloromethane	ppbv	0.2	11	12	7	10
1,4-Dioxane (1,4-Diethylene Dioxide)	ppbv	0.2	10	18	ND	9.4
cis-1,3-Dichloropropene	ppbv	0.2	2	2	ND	1.4
Toluene (Methyl Benzene) ^c	ppbv	0.2	8300	10200	1810	6770
4-Methyl-2-pentanone (MIBK) ^c	ppbv	0.2	946	1080	633	886
t-1,3-Dichloropropene	ppbv	0.2	4	4	1	3
Tetrachloroethylene (Perchloroethylene)	ppbv	0.2	219	263	46	176
1,1,2-Trichloroethane	ppbv	0.2	50	57	10	39
Dibromochloromethane	ppbv	0.2	47	1	ND	16
1,2-Dibromoethane (Ethylene dibromide)	ppbv	0.2	15	5	1	7
2-Hexanone (Methyl Butyl Ketone)	ppbv	0.2	ND	226	1096	441
Ethylbenzene	ppbv	0.2	3430	4190	762	2800
Chlorobenzene ^d	ppbv	0.2	98 J	60 J	529 J	229 J

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
m/p-Xylene (Dimethyl Benzene)	ppbv	0.2	3510	3890	4530	3980
o-Xylene (Dimethyl Benzene)	ppbv	0.2	1710	2160	373	1410
Styrene (Vinylbenzene)	ppbv	0.2	265	345	55	222
Tribromomethane (Bromoform)	ppbv	0.2	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	ppbv	0.2	ND	ND	ND	ND
1-Ethyl-4-methylbenzene (4-Ethyl Toluene) ^b	ppbv	0.2	476 J	578 J	103 J	386 J
1,3,5-Trimethylbenzene ^b	ppbv	0.2	476 J	578 J	103 J	386 J
1,2,4-Trimethylbenzene ^c	ppbv	0.2	1140	1450	255	949
1,4-Dichlorobenzene ^c	ppbv	0.2	304	393	66	255
1,3-Dichlorobenzene	ppbv	0.2	5	1	ND	2.03
Benzyl Chloride	ppbv	0.2	23	27	10	20
1,2-Dichlorobenzene	ppbv	0.2	ND	1	ND	0.4
1,1,2,3,4,4-Hexachloro-1,3-butadiene ^c	ppbv	0.2	8	6	2	5
1,2,4-Trichlorobenzene ^c	ppbv	0.2	7	8	ND	5
Acrylonitrile	ppbv	20	ND	ND	ND	ND
Dichlorofluoromethane (Freon 21)	ppbv	20	ND	ND	ND	ND
Chlorodifluoromethane (Freon 22)	ppbv	20	ND	ND	ND	ND
Ethyl Mercaptan (Ethanediol)	ppbv	20	ND	ND	ND	ND
Carbonyl Sulfide (Carbon oxysulfide)	ppbv	20	ND	ND	ND	ND

ND – Constituent not detected at the stated detection limits.

^a In computing averages, when all measurements are ND, the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50 percent of the stated MDL. If MDL is not reported, a ND measurement is treated as zero.

^b 1-Ethyl-4-methylbenzene (4-Ethyl Toluene) and 1,3,5-Trimethylbenzene co-eluted from the GC and also have the same quantitation ions, thus making them indistinguishable. Therefore, the reported values represent the combined concentrations of these two compounds.

^c Analyte detected in blank sampled 0.21 to 3.03 ppbv. See Table 5-2 for analyte-specific detected levels.

^d Chlorobenzene spike recovery was 211 percent.

Table 4-2. Raw Landfill Gas Non-Methane Organic Compound (NMOC) Concentrations

	NMOC (ppmv as Hexane)	CH ₄ (% v/v)		CO ₂ (% v/v)		O ₂ (%v/v)	N ₂ (% v/v)	Moisture (% v/v)
	Method 25C	Method 25C	Method 3C	Method 25C	Method 3C	Method 3C	Method 3C	Method 23
Run 1	377	40.6	37.3	31.9	29.9	6.0	24.4	2.1
Run 2	314	39.2	35.8	30.7	28.8	6.6	26.2	1.8
Run 3	374	37.7	35.2	29.5	28.2	6.6	26.2	2.1
Average	355	39.2	36.1	30.7	29.0	6.4	25.6	2.0

Concentrations are reported without correction for nitrogen

Method 25C hold time was 49 days; 19 days longer than the specified 30 days

4.1.2.3 Hydrogen Sulfide (H₂S)

Landfill gas (LFG) pipe H₂S concentrations were obtained by collecting and analyzing the samples in accordance with EPA Method 11. These analytical results are presented in Table 4-3.

Table 4-3. Raw Landfill Gas Hydrogen Sulfide (H₂S) Concentrations

	H ₂ S Concentration	
	(mg/m ³)	(ppmv)
Run 1 ^a	26.4	18.7
Run 2	36.1	25.6
Run 3	27.1	19.2
Run 4	33.8	24.0
Average ^b	32.3	22.9

^a Did not purge at end of Run 1. Added Run 4 to complete set.

^b Run 1 data was not included in averaged value

4.1.2.4 Carbonyls

The target carbonyl compounds, formaldehyde and acetaldehyde, were analyzed by Method TO-11 on samples collected by EPA Method 0100. The analysis results are presented in Table 4-4.

Table 4-4. Raw Landfill Gas Pipe Carbonyls Concentrations

	Formaldehyde ^a		Acetaldehyde	
	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)
MDL	2	1.6	4	2.2
Run 1	3.31 J	2.65 J	35.0	19.1
Run 2	4.07 J	3.26 J	21.9	12.0
Run 3	3.45 J	2.76 J	24.1	13.2
Average	3.61 J	2.89 J	27.0	14.8

^a Measured formaldehyde values were near MDL

4.1.2.5 Mercury (Hg)

Mercury (Hg) can exist in several forms. This test program focused on the elemental, monomethyl, and dimethyl forms of Hg, and total Hg. Elemental Hg was measured with the LUMEX instrument. Organic monomethyl Hg, dimethyl Hg and total Hg were sampled and analyzed using the organic mercury method.

4.1.2.5.1 Total Mercury (Hg) Samples

To collect the total Hg samples, an iodated charcoal trap was used as a sorbent. A backup tube was also present to assess any breakthrough. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-5 presents the total Hg concentrations in the raw LFG. They ranged from 158 to 234 ng/m^3 with an average of 204 ng/m^3 . Spike recovery for total Hg samples was 95 percent.

Table 4-5. Raw Landfill Gas Total Mercury Concentrations

	Total Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppm)
MDL	50	6.0
Run 1	219	24.5
Run 2	234	26.2
Run 3	158	17.7
Average	204	22.8

Sample hold time exceeded 14 days

Hold times exceeded 14 days

4.1.2.5.2 Dimethyl Mercury (Hg) Samples

To collect the dimethyl Hg sample, a carbotrap was used with a sorbent. A backup tube was also present to assess any breakthrough. A third iodated carbon trap was also present to collect any elemental Hg present. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-6 presents the dimethyl Hg concentrations in the raw LFG. These ranged from 1.6 to 2.1 ng/m³ with an average of 1.9 ng/m³. Spike recoveries for the dimethyl Hg traps ranged from 1.5 to 4.4 percent, well below normally acceptable levels. The spiked traps, without being exposed to the raw LFG, had recoveries from 68 to 98 percent with an average of 83 percent. Recoveries were low in the spiked traps possibly because of the presence of an unknown interfering compound either destroying or masking the detection of the dimethyl Hg. For this reason, dimethyl Hg concentrations data were flagged with “R” to indicate that the data were rejected. Further development of this procedure is being undertaken by Frontier Geosciences. More studies are needed to develop an acceptable method to more accurately determine the actual dimethyl Hg concentrations.

Table 4-6. Raw Landfill Gas Dimethyl Mercury Concentrations

	Dimethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.5	0.05
Run 1	2.0 R	0.209 R
Run 2	2.1 R	0.220 R
Run 3	1.6 R	0.168 R
Average	1.9 R	0.200 R

Sample hold times exceeded 14 days

Spike recoveries were 0 – 5 percent

R – The results are rejected due to serious deficiencies per EPA QA/G-8 guidance

4.1.2.5.3 Monomethyl Mercury (Hg) Samples

To collect the sample, a set of three impingers filled with 0.001 M HCl was used to collect the monomethyl Hg. An empty fourth impinger was used to knockout any impinger solution carryover to the pump and meter system. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

As shown in Table 4-7, monomethyl Hg concentrations in the raw LFG ranged from 1.1 to 1.3 ng/m³ with an average amount of 1.2 ng/m³. Spike recovery for the monomethyl Hg sample was 70 percent.

Table 4-7. Raw Landfill Gas Monomethyl Mercury Concentrations

	Monomethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.13	0.014
Run 1	1.3	0.146
Run 2	1.1	0.123
Run 3	1.1	0.123
Average	1.2	0.134

Sample hold time exceeded 14 days

Relative standard deviation (RSD) of replicate sample exceeded ±30 percent

4.1.2.5.4 Elemental Mercury (Hg)

Elemental mercury (Hg) was determined by the LUMEX instrument and the results are presented in Table 4-8. Before any measurement was made, the LUMEX instrument was zeroed. The background measurements were made by drawing a sample of ambient air through and ice-chilled empty impinger and recording the LUMEX instrument reading.

Table 4-8. Raw Landfill Gas Elemental Mercury Concentrations

	Concentration ^a			
	Background ^b		Gas Pipe	
	(ng/m ³)	(x10 ⁻⁶ ppmv)	(ng/m ³)	(x10 ⁻⁶ ppmv)
Run 1	0	0	61	7.3
Run 2	0	0	53	6.4
Run 3	0	0	60	7.2
Average	0	0	58	7.0

^a Average of three readings, each of 30-seconds duration

^b Background measurement was made by sampling ambient air drawn through ice-chilled empty impinger

4.2 Flare Stack Results

The flare stack was sampled for NMOCs (as THC_s), PCDD/PCDFs, PAHs, HCl, Pb, As, Cd, Cr, Mn, Ni, total Hg, SO₂, NO_x, CO, CO₂, and O₂. The stack cross section was divided into 24 equal areas according to EPA Method 1. Sampling run time for HCl and metals was 60 minutes. Run time for PCDD/PCDFs sampling was 180 minutes. Run time for CEMS parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) varied.

4.2.1 Flare Stack Gas Flow Rate and Temperature

Sampling at the flare stack was conducted at isokinetic conditions. The procedures provided stack gas velocity distribution across the flare stack and reliable measurements of stack gas flow rates. Table 4-9 lists the volumetric flow rates and temperatures at the flare stack measured during the various sampling runs.

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Table 4-9. Flare Stack Gas Operating Conditions, Measured during Sampling

Run Number	Duration	Average Stack Temp (°F)	Carbon Dioxide (%)	Oxygen (%)	Moisture (%)	Velocity (actual ft/sec)	Vol. Flow Rate (acfm)	Vol. Flow Rate (dscfm)
B-POST-M26-110402-01	11/4/02 17:05-18:19	1419	4.8	16.1	7.3	17.0	77400	20200
B-POST-M26-110402-02	11/4/02 17:07-18:21	1418	4.8	16.1	6.6	16.9	77000	20300
B-POST-M26-110402-03	11/5/02 14:03-15:15	1374	2.9	12.5	5.8	16.9	77000	21000
B-POST-M29-110502-01	11/4/02 9:40-10:53	1359	4.8	16.1	6.1	17.5	79900	21900
B-POST-M29-110502-02	11/5/02 11:29-12:42	1368	4.8	16.1	6.1	16.7	76100	20800
B-POST-M29-110502-03	11/5/02 14:05-15:17	1380	2.9	12.5	6.7	17.0	77500	20900
B-POST-M23-110402-01	11/4/02 12:30-15:39	1414	4.8	16.1	7.0	16.4	74800	19700
B-POST-M23-110402-02	11/4/02 12:31-15:41	1411	4.8	16.1	6.5	16.4	74500	19700
B-POST-M23-110502-03	11/5/02 09:40-12:51	1359	2.9	12.5	6.2	17.6	80200	22000
Average		1389	4.2	14.9	6.5	16.9	77200	20700

Flare stack cross-section flow area was 75.94 sq. ft.

4.2.1.1 Flare Stack Oxygen (O₂) and Carbon Dioxide (CO₂)

Oxygen (O₂) and CO₂ concentrations provide an overall indication of the combustion process. Figure 4-1 shows the O₂ and CO₂ concentrations measured by the CEMs during the two days of testing. The plotted data included the CEM responses to the instrument zeroing and calibration periods. These periods manifest as the peaking and bottoming of the recorded values. Table 4-10 presents the daily averages of O₂ and CO₂ concentrations.

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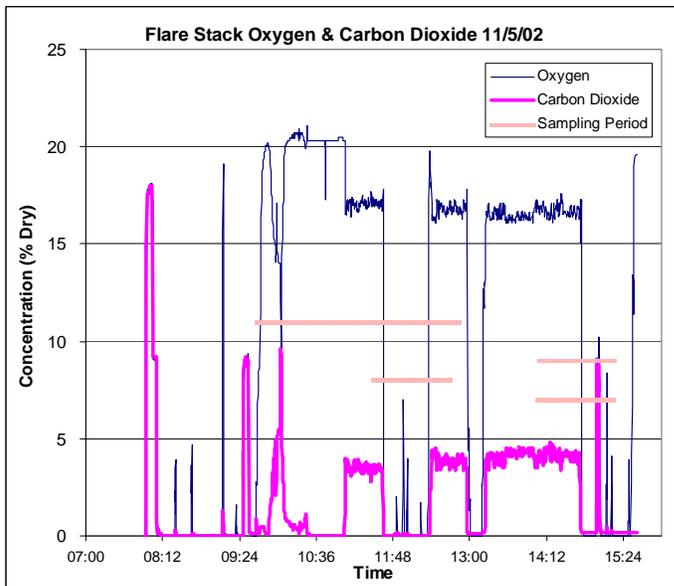
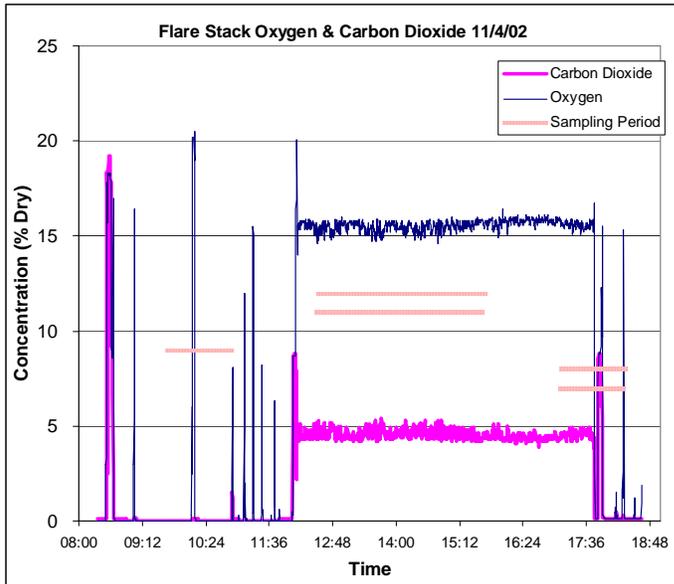


Figure 4-1. Flare Stack Oxygen and Carbon Dioxide Concentrations

Table 4-10. Flare Stack Combustion Products Concentrations

	O₂ (% v)	CO₂ (% v)
Run 1	16.1	4.8
Run 2	17.0	4.2
Average	16.6	4.5

CEM sampling system malfunctioned and reduced the amount of useable data

4.2.1.2 Flare Stack Total Hydrocarbon (THC) Emissions

Flare stack THC emissions were measured by EPA Method 25A, which used a CEM. At the flare stack, hydrocarbon (including NMOCs) concentrations were found to be below 50 ppmv. The low concentrations rendered Method 25C, the method designed specifically for NMOC measurement, unsuitable to be applied at this location.

In its place, EPA Method 25A produced concentrations of all hydrocarbons that respond to flame ionization detector (FID) analysis. Real-time continuous instrument responses are shown in Figure 4-2. The time-averaged concentrations are presented in Table 4-11. As can be seen, the concentrations of THCs were low and less than 10 ppmv. The duration of valid measurements made during the second test day (Run 2) was limited because of the failure of the temperature controller that maintained the temperature of the heated sample line. The sample line was overheated and out-gassed, as evidenced by the wild fluctuations in measured hydrocarbons during most of the early part of the day. Although towards the end of the test, the test team was able to restore operation of the hydrocarbon measurement system, the hydrocarbon test results during Run 2 need to be viewed with caution.

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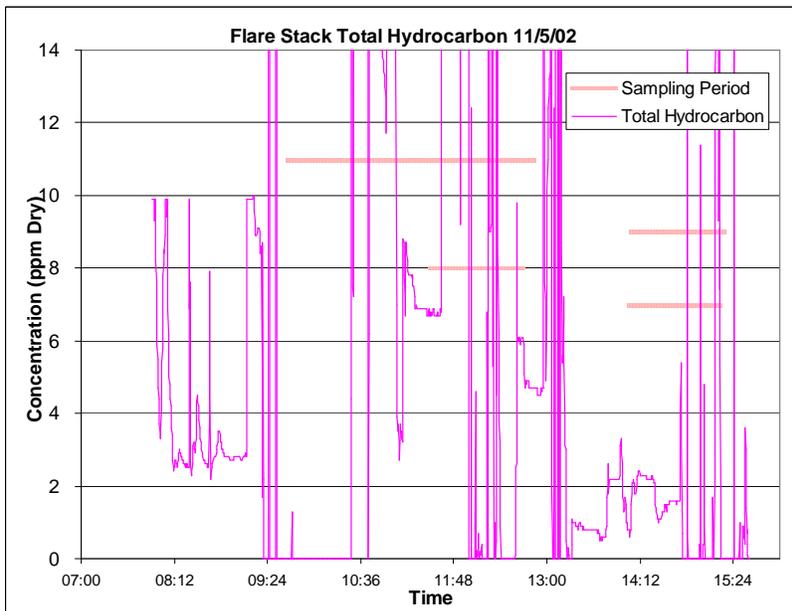
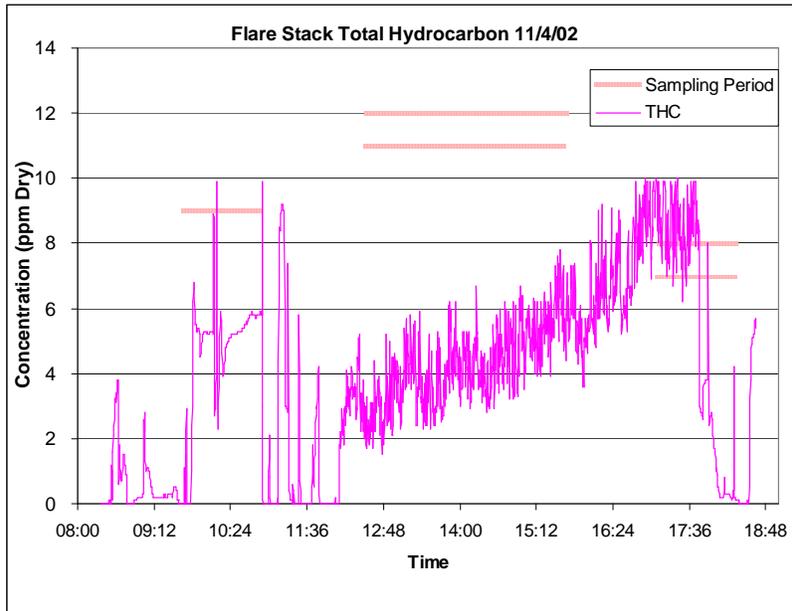


Figure 4-2. Flare Stack Total Hydrocarbons Concentrations

Table 4-11. Flare Stack THC Concentrations

	THC (ppmdv as propane)	THC (ppmdv as hexane)
Run 1	6	2
Run 2	1 ^a	0.5
Average	4	2

^a Based on limited data near the end of test

4.2.1.3 Flare Stack Dioxin/Furan Emissions (PCDD/PCDFs)

Three EPA Method 23 sampling runs were performed. As a cost-saving measure, only the samples from one run (Run 3) were analyzed. Samples from runs 1 and 2 have been extracted and are being held in the laboratory for possible future analysis.

Table 4-12 presents the flare stack PCDD/PCDFs emissions data. Concentrations for most targets were below their detection limit and these were denoted by the less than (“<”) sign, followed by the detection concentration level of that target. The mass emission rates were calculated based on the target concentrations and the exhaust gas flow rates measured at the sampling location.

Table 4-13 presents the same data, but expressed in terms of Toxicity Equivalent emissions.

4.2.1.4 Flare Stack Polycyclic Aromatic Hydrocarbon (PAH) Emissions

The concentrations of PAHs were obtained by Method 23 analyses. The results are presented in Table 4-14.

Table 4-12. Flare Stack Dioxins and Furans Emissions

Analyte	B-POST-M23-110502-03		
	Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
Dioxins			
2,3,7,8-TCDD	< 0.346	< 12.9	28.5
Other TCDD	11.3	421	929
1,2,3,7,8-PeCDD	< 0.291	< 10.9	23.9
Other PeCDD	13.6	507	1100
1,2,3,4,7,8-HxCDD	<0.504	< 18.8	41.5
1,2,3,6,7,8-HxCDD	< 0.468	< 17.4	38.4
1,2,3,7,8,9-HxCDD	< 0.477	< 17.8	39.2
Other HxCDD	4.1	154	339
1,2,3,4,6,7,8-HpCDD	< 0.254	< 9.5	20.9
Other HpCDD	2.4	88.8	196
1,2,3,4,6,7,8,9-OCDD	< 0.983	< 36.7	80.9
Total CDD	34.7	1300	2900
Furans			
2,3,7,8-TCDF	0.587	21.9	48.2
Other TCDF	0.0088	8800	19400
1,2,3,7,8-PeCDF	1.1	40.9	90.3
2,3,4,7,8-PeCDF	1.0	38.0	83.7
Other PeCDF	110	4100	9100
1,2,3,4,7,8-HxCDF	1.1	42.7	94.2
1,2,3,6,7,8-HxCDF	0.166	6.2	13.7
2,3,4,6,7,8-HxCDF	0.194	7.2	16.0
1,2,3,7,8,9-HxCDF	0.218	8.1	18.0
Other HxCDF	34.7	1300	2900
1,2,3,4,6,7,8-HpCDF	0.158	5.9	13.0
1,2,3,4,7,8,9-HpCDF	0.215	8.0	17.7
Other HpCDF	4.6	170	375
1,2,3,4,6,7,8,9-OCDF	1.1	42.5	93.7
Total CDF	156	14600	32200
Total CDD/CDF	190	15900	35000

Two additional samples were collected, extracted and held in the laboratory for possible future analyses: B-POST-M23-110402-01 and B-POST-M23-110402-02

"<" denotes the measurement was non-detect. The value following the "<" sign is the detection limit.

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Table 4-13. Flare Stack Dioxins and Furans Toxicity Equivalent Emissions

Pollutant	Concentration	Emission Rate		1989 Toxicity Equivalency Factor	Toxicity Equivalent Emissions		
					Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
<u>Dioxins</u>							
2,3,7,8-TCDD	< 0.346	< 12.9	< 28.5	1	< 0.346	< 12.9	< 28.5
Other TCDD	11.3	421	929	---	NA	NA	NA
1,2,3,7,8-PeCDD	< 0.291	< 10.9	< 23.9	0.5	< 0.146	< 5.4	< 12.0
Other PeCDD	13.6	507	1100	---	NA	NA	NA
1,2,3,4,7,8-HxCDD	< 0.504	< 18.8	< 41.5	0.1	< 0.0504	< 1.9	< 4.2
1,2,3,6,7,8-HxCDD	< 0.468	< 17.4	< 38.4	0.1	< 0.0468	< 1.7	< 3.8
1,2,3,7,8,9-HxCDD	< 0.477	< 17.8	< 39.2	0.1	< 0.0477	< 1.8	< 3.9
Other HxCDD	4.1	154	339	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDD	< 0.254	< 9.5	< 20.9	0.01	< 0.00254	< 0.095	< 0.209
Other HpCDD	2.4	89	196	---	NA	NA	NA
1,2,3,4,6,7,8,9-OCDD	< 0.983	< 36.7	< 80.9	0.001	< 0.000983	< 0.0367	< 0.0809
Total CDD	34.7	1300	2900	---	0.640	23.9	52.6
<u>Furans</u>							
2,3,7,8-TCDF	0.587	21.9	48.2	0.1	0.0587	2.2	4.8
Other TCDF	0.0088	8800	19400	---	NA	NA	NA
1,2,3,7,8-PeCDF	1.1	41	90	0.05	0.055	2.0	4.5

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Pollutant	Concentration	Emission Rate		1989 Toxicity Equivalency Factor	Toxicity Equivalent Emissions		
					Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
2,3,4,7,8-PeCDF	1.0	38	84	0.5	0.51	19.0	42
Other PeCDF	110	4100	9100	---	NA	NA	NA
1,2,3,4,7,8-HxCDF	1.1	43	94	0.1	0.11	4.3	9.4
1,2,3,6,7,8-HxCDF	0.166	6.2	14	0.1	0.0166	0.62	1.4
2,3,4,6,7,8-HxCDF	0.194	7.2	16	0.1	0.0194	0.72	1.6
1,2,3,7,8,9-HxCDF	0.218	8.1	18	0.1	0.0218	0.81	1.8
Other HxCDF	34.7	1300	2900	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDF	0.158	5.9	13	0.01	0.00158	0.059	0.13
1,2,3,4,7,8,9-HpCDF	0.215	8.0	18	0.01	0.00215	0.080	0.18
Other HpCDF	4.6	170	375	---	NA	NA	NA
1,2,3,4,6,7,8,9-OCDF	1.1	43	94	0.001	0.0011	0.043	0.094
Total CDF	155	14600	32200	---	0.800	29.8	65.8
Total CDD/CDF	190	15900	35000	---	1.4	53.7	118.4

In computing averages, when all measurements are ND, the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50 percent of the stated MDL. If MDL is not reported, a ND measurement is treated as zero.

"<" denotes the measurement was non-detect. The value following the "<" sign is the detection limit.

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Table 4-14. Flare Stack Polycyclic Aromatic Hydrocarbons Emissions

Analyte	Formula Weight	B-POST-M23-110502-03			
		Concentration		Emission Rate	
		(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁻⁶ g/hr)	(x10 ⁻⁶ lb/hr)
Acenaphthene	154.21	2.5	16.2	604	1.30
Acenaphthylene	152.20	0.489	3.1	115	0.254
Anthracene	178.23	1.1	8.3	308	0.678
Benzo(a)anthracene	228.30	0.261	2.5	92.3	0.204
Benzo(a)pyrene	252.32	0.106	1.1	41.5	0.092
Benzo(b)fluoranthene	252.32	0.299	3.1	117	0.258
Benzo(g,h,i)perylene	276.34	0.219	2.5	94	0.207
Benzo(k)fluoranthene	252.32	0.092	1.0	36	0.079
Chrysene	228.29	0.266	2.5	94	0.207
Dibenzo(a,h)anthracene	278.35	0.025	0.3	11	0.024
Fluoranthene	202.26	2.7	22.4	837	1.8
Fluorene	166.22	46.1	319	11900	26.2
Indeno(1,2,3-cd)pyrene	288.35	0.0969	1.2	43	0.096
Naphthalene ^a	128.17	761	4060	151000	333
Phenanthrene	178.23	1.5	12	430	0.94
Pyrene	202.26	2.1	18	670	1.5
2-Methylnaphthalene	142.20	585	3460	129000	285
Benzo(e)Pyrene	252.32	0.238	2.5	93	0.205
Perylene	253.31	0.0371	0.4	14.5	0.032

Two additional samples were collected, extracted and held in the laboratory for possible future analyses: B-POST-M23-110402-01 and B-POST-M23-110402-02

Analysis hold time was 50 days. Method specified hold time is 40 days.

Spike recovery ranged from 57.9 to 124 percent

a – 1920 ng found in reagent blank. More than 60000 ng found in test sample

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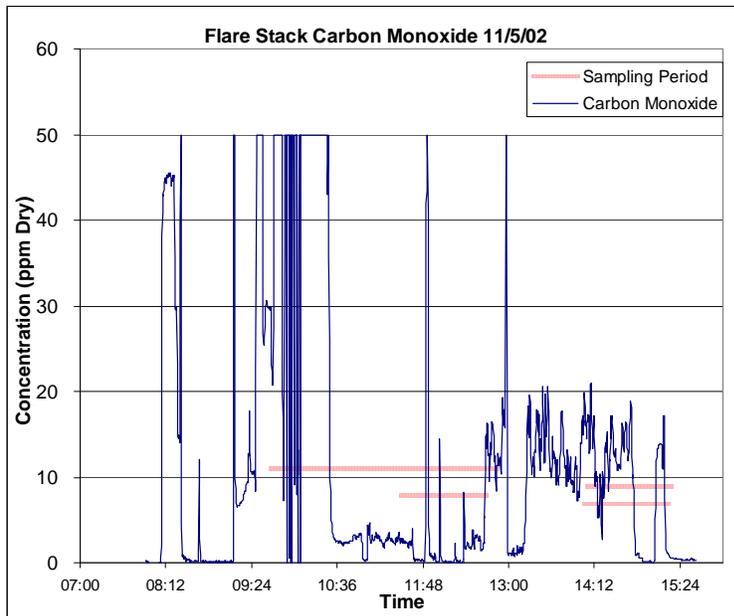
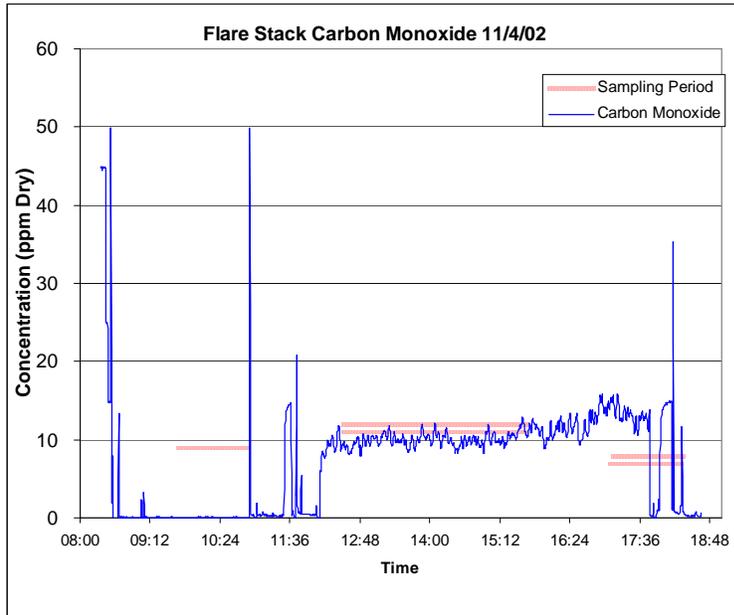


Figure 4-3. Flare Stack Carbon Monoxide Concentrations

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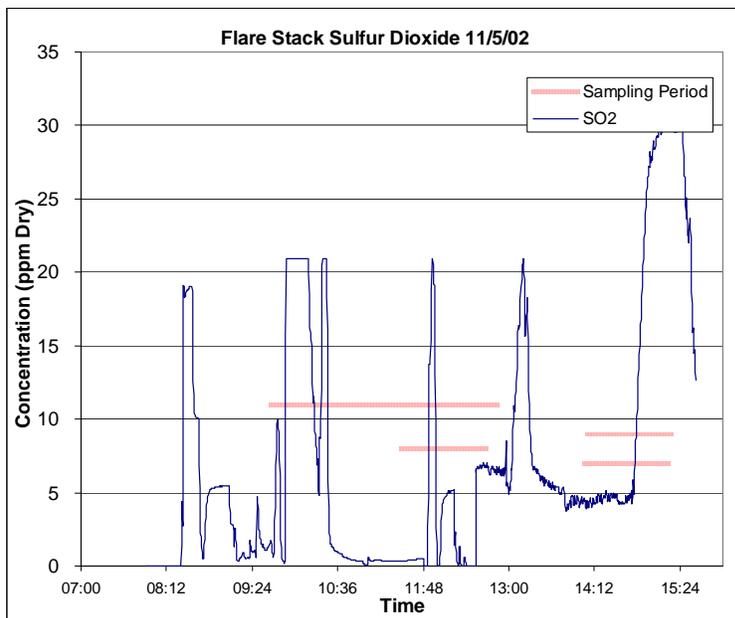
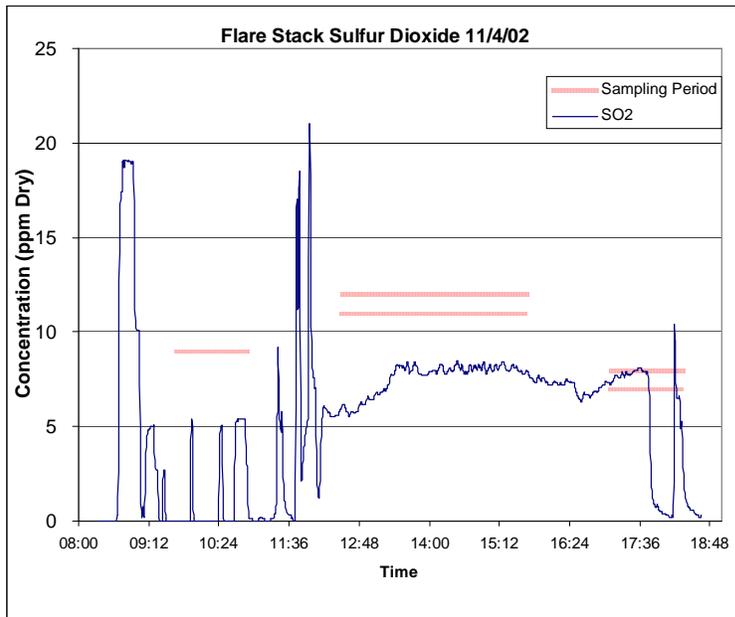


Figure 4-4. Flare Stack Sulfur Dioxide Concentrations

Source Test Report for Landfill B

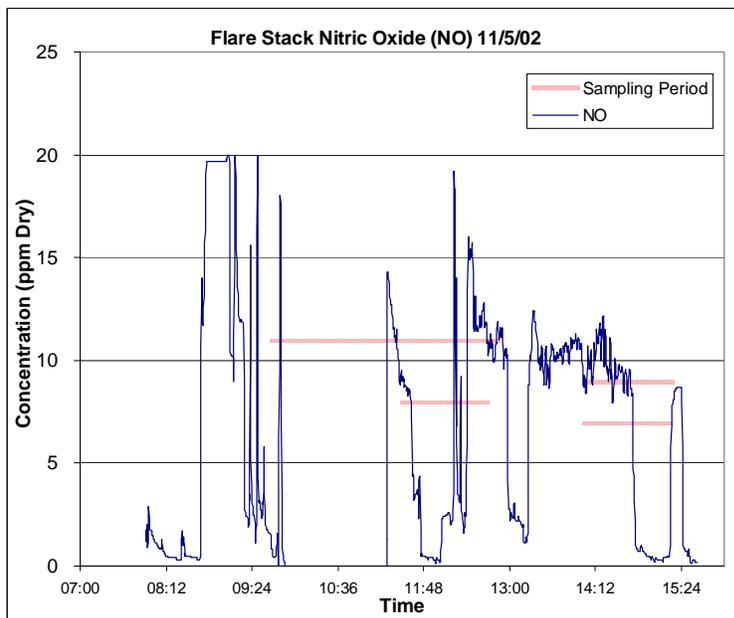
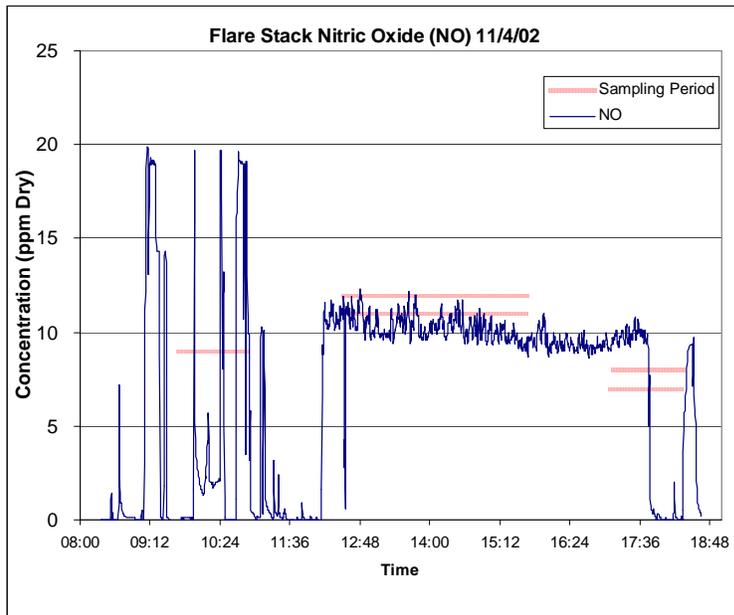


Figure 4-5. Flare Stack Nitric Oxide Concentrations

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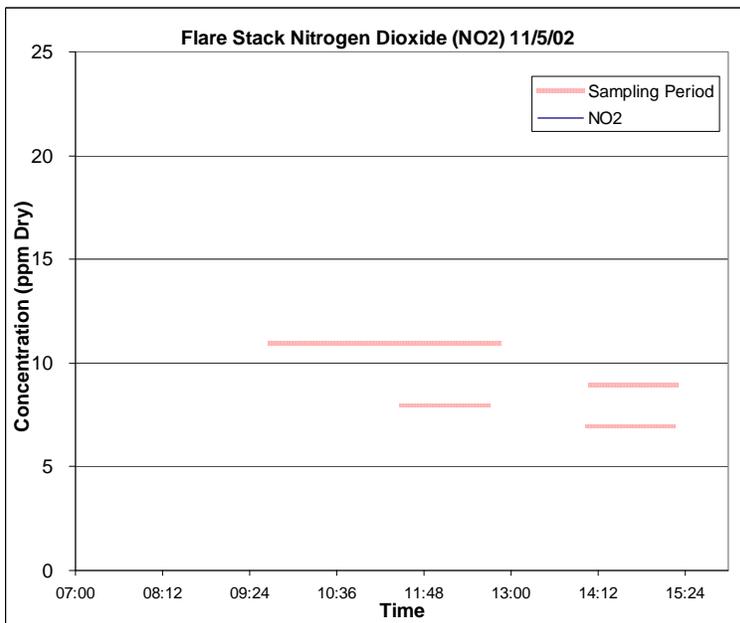
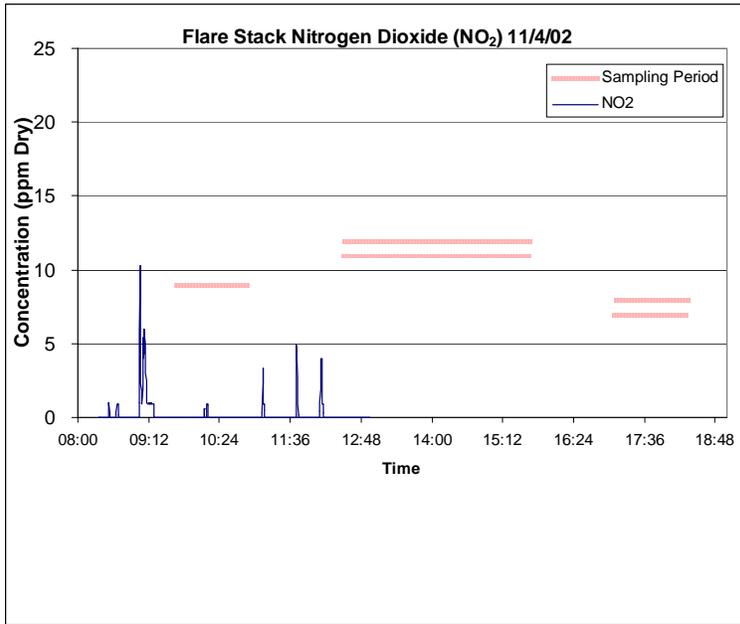


Figure 4-6. Flare Stack Nitrogen Dioxide Concentrations

4.2.2 Hydrogen Chloride (HCl) Emission Results

Flare stack HCl emissions results are presented in Table 4-15.

Table 4-15. Flare Stack Hydrogen Chloride Emissions

	HCl Concentrations		HCl Emission Rate	
	(ppmdv)	(mg/m ³)	(lb/hr)	(g/hr)
Run 1	1.4	2.1	0.16	72
Run 2	1.0	1.5	0.12	52
Run 3	0.9	1.4	0.11	48
Average	1.1	1.7	0.13	57

4.2.2.1 Metals Emissions Results

Toxic heavy metals in the flare stack gases were measured by Method 29. Manganese was determined by inductively coupled plasma – mass spectroscopy (ICP-MS). Arsenic (As), Cd, Cr, Pb, and Ni were determined by graphite furnace atomic absorption spectroscopy (GFAAS). Mercury was determined by cold vapor (CV) AA and was not detected in any of the samples. Table 4-16 presents the flare stack metals emissions results.

Mercury (Hg) concentration (elemental) was separately measured by the LUMEX instrument and those results are also included in Table 4-16.

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Table 4-16. Flare Stack Metals Emissions

Analyte	B-POST-M29-110502-01			B-POST-M29-110502-02			B-POST-M29-110502-03			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)
Arsenic	0.90	34	74	< 0.80	< 0.028	62	0.79	28	62	0.70	30	66
Cadmium	0.24	8.7	19	0.065	2.3	5.1	0.25	8.7	19	0.18	6.6	14.5
Chromium	1.8	67	150	1.4	5.1	110	1.7	61.3	140	1.7	60	132
Lead	0.66	24.5	54	0.62	22	48	0.69	24.3	54	0.65	23.5	52
Manganese	6.4	240	530	5.2	180	410	13	470	1000	8.3	300	660
Nickel	2.1	80	180	1.6	56	120	1.6	56	120	1.8	64	140
Mercury (Total by method 29)	< 3.9	< 0.14	< 320	< 4.1	< 0.15	< 320	< 4.1	< 0.15	< 320	ND	ND	ND
	RUN 1			RUN 2			RUN 3			Average		
Mercury (Elemental by LUMEX)	0.001	.036	0.079	0.004	0.14	0.32	0.005	0.18	0.40	0.0033	0.12	0.26

4.2.2.2 *Gaseous Emissions: Carbon Monoxide (CO), Sulfur Dioxide (SO₂), and Nitrogen Oxides (NO_x)*

Gaseous emissions measured with CEMs include CO, SO₂, and NO_x. These results are presented in Table 4-17.

Table 4-17. Flare Stack CO, SO₂, NO_x Concentrations

	Concentration (ppmdv)		
	CO	SO ₂ ^a	NO _x (as NO) ^b
Run 1	11	8	10
Run 2	13	3	12
Average	10	6	11

^a System bias = 1 – 24 percent, Drift check = 1 – 180 percent

^b Drift check = 0 – 13 percent

4.3 Comparison with AP-42 Default Values

One of the major objectives of the test program is to expand on the database of LFG constituent compounds and their concentrations. If warranted, these data may contribute towards updating the AP-42 default values.

Table 4-18 presents the concentrations of LFG constituents to provide direct comparisons with AP-42 default values. Table 4-19 presents the concentration of other constituents targeted by the various analyses but are not listed in AP-42. An expanded discussion and comparison is included in the overall project summary report.

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Table 4-18. Comparison of Raw Landfill Gas Constituent Concentrations with AP-42 Default Values

Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1,1,1-Trichloroethane	71-55-6	133.42	0.48	0.0002	0.031	10.7	171	436	0.962
M-40	1,1,2,2-Tetrachloroethane	79-34-5	167.85	1.11	0.0002	ND	ND	ND	ND	ND
M-40	1,1-Dichloroethane (Ethylidene Dichloride)	75-34-3	98.96	2.35	0.0002	0.178	45.5	729	1860	4.1
M-40	1,1-dichloroethene	75-35-4	96.94	0.20	0.0002	0.008	2.0	32	82	0.18
M-40	1,2-Dichloroethane	107-06-2	98.96	0.41	0.0002	0.005	1.3	21	52	0.12
M-40	1,2-Dichloropropane	78-87-5	112.98	0.18	0.0002	0.005	1.5	23	60	0.13
M-40	Isopropyl alcohol (2-Propanol)	67-63-0	60.11	50.10	0.0002	0.356	55.3	886	2260	5.0
M-40	Acetone	67-64-1	58.08	7.01	0.0002	1.61	242	3870	9860	21.7
M-40	Acrylonitrile	107-13-1	53.06	6.33	0.020	ND	ND	ND	ND	ND
M-40	Bromodichloromethane	75-27-4	163.83	3.13	0.0002	0.010	4.2	68	170	0.381
M-40	Butane	106-97-8	58.12	5.03	1	3.30	496	7940	20200	44.6
M-40	Carbon Disulfide	75-15-0	76.13	0.58	0.0002	0.134	26.4	422	1080	2.4
No Test	Carbon Monoxide	630-08-0	28.01	141.00		NM	NM	NM	NM	NM
M-40	Carbon Tetrachloride	56-23-5	153.84	0.004	0.0002	0.005	2.0	32	81	0.18
M-40	Carbonyl Sulfide (Carbon oxysulfide)	463-58-1	60.07	0.49	0.020	ND	ND	ND	ND	ND
M-40	Chlorobenzene	108-90-7	112.56	0.25	0.0002	0.229	66.6	1070	2720	6.0
M-40	Chlorodifluoromethane (Freon 22)	75-45-6	86.47	1.30	0.020	ND	ND	ND	ND	ND
M-40	Chloroethane (Ethyl Chloride)	75-00-3	64.52	1.25	0.0002	1.88	314	5020	12800	28.2

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	Chloroform	67-66-3	119.39	0.03	0.0002	0.190	58.6	939	2390	5.3
M-40	Chloromethane	74-87-3	50.49	1.21	0.0002	0.072	9.4	150	390	0.85
M-40	1,2-Dichlorobenzene	95-50-1	147.01	0.21	0.0002	0.0004	0.15	2.4	6.2	0.014
M-40	1,3-Dichlorobenzene	541-73-1	147.00	0.21	0.0002	0.00203	0.771	12.4	31.5	0.0694
M-40	1,4-Dichlorobenzene	106-46-7	147.00	0.21	0.0002	0.255	96.9	1550	3960	8.7
M-40	Dichlorodifluoromethane (Freon 12)	75-71-8	120.91	15.70	0.0002	0.468	146	2340	5970	13.2
M-40	Dichlorofluoromethane (Freon 21)	75-43-4	102.92	2.62	0.020	ND	ND	ND	ND	ND
M-40	Methylene Chloride (Dichloromethane)	75-09-2	84.94	14.30	0.0002	0.169	37.1	594	1510	3.3
No Test	Dimethyl Sulfide (Methyl sulfide)	75-18-3	62.13	7.82		NM	NM	NM	NM	NM
M-40	Ethane	74-84-0	30.07	889.00	1	4.6	360	5730	14600	32.2
M-40	Ethanol	64-17-5	46.08	27.20	0.0002	0.202	24.1	385	980	2.2
M-40	Ethyl Mercaptan (Ethanediol)	75-08-1	62.13	2.28	0.020	ND	ND	ND	ND	ND
M-40	Ethylbenzene	100-41-4	106.16	4.61	0.0002	2.80	767	12300	31300	69.0
M-40	1,2-Dibromoethane (Ethylene dibromide)	106-93-4	187.88	0.001	0.0002	0.007	3.4	55	140	0.306
M-40	Trichloromonofluoromethane (Fluorotrichloromethane) (F11)	75-69-4	137.38	0.76	0.0002	0.327	116	1860	4740	10.5
M-40	Hexane	110-54-3	86.18	6.57	0.0002	1.95	434	6950	17700	39.0
M-11	Hydrogen Sulfide	7783-06-4	34.08	35.50		22.9	0.0020	32400	82500	182

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
Organic mercury	Mercury (Dimethyl)		230.66	Not Listed	0.05E-06	R	R	R	R	R
LUMEX	Mercury (Elemental)	7439-97-6	200.61	Not Listed		7.0E-6	0.0036	0.058	0.15	0.000326
Organic mercury	Mercury (Monomethyl)		215.62	Not Listed	0.014E-06	.134E-6	0.0000747	0.00120	0.00305	0.0000067
Organic mercury	Mercury (Total)		215.63	2.53E-04	6E-06	22.8E-6	0.0127	0.204	0.52	0.00114
M-40	2-Butanone (Methyl Ethyl Ketone)	78-93-3	72.10	7.09	0.0002	1.43	267	4280	10900	24.0
M-40	2-Hexanone (Methyl Butyl Ketone)	591-78-6	100.16	1.87	0.0002	0.441	114	1830	4660	10.3
No Test	Methyl Mercaptan (Methanethiol)	74-93-1	48.11	2.49		NM	NM	NM	NM	NM
M-40	Pentane	109-66-0	72.15	3.29	1	2.60	485	7770	19800	43.6
M-40	Tetrachloroethylene (Perchloroethylene)	127-18-4	165.83	3.73	0.0002	0.176	75.4	1210	3080	6.8
M-40	Propane	74-98-6	44.09	11.10	1	5.9	670	10800	27500	60.5
M-40	t-1,2-Dichloroethene	156-60-5	96.94	2.84	0.0002	0.009	2.3	36	92	0.20
M-40	Trichloroethylene (Trichloroethene)	79-01-6	131.38	2.82	0.0002	0.103	35.0	560	1430	3.1
M-40	Vinyl Chloride	75-01-4	62.50	7.34	0.0002	0.410	66.2	1060	2700	6.0
M-40	m/p-Xylene (Dimethyl Benzene)	1330-20-7	106.16	12.10	0.0002	3.98	1100	17500	44600	98.2
M-40	o-Xylene (Dimethyl Benzene)	95-47-6	106.16	12.10	0.0002	1.41	388	6210	15800	34.9

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	Benzene (Co-disposal)	71-43-2	78.11	11.10	0.0002	0.251	50.7	812	2070	4.6
M-40	Benzene (No-disposal or Unknown)	71-43-2	78.11	1.91	0.0002	0.251	50.7	812	2070	4.6
M-25C	NMOC as Hexane (Co-disposal)		86.17	2420.00		355	79100	1270000	3230000	7.1
M-25C	NMOC as Hexane (No-codisposal or Unknown)			595		355	79100	1270000	3230000	7.1
M-40	Toluene (Methyl Benzen) (Co-disposal)	108-88-3	92.13	165.00	0.0002	6.77	1600	25800	65800	145
M-40	Toluene (Methyl Benzene) (No or Unknown)			39.30	0.0002	6.77	1600	25800	65800	145

R – Data were rejected because of serious deficiency in spike recovery

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Table 4-19. Raw Landfill Gas Constituent Concentrations for Compounds without AP-42 Default Values

Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-0100	Acetaldehyde	75-07-0	44.05	0.0023	0.015	1.7	27	69	0.15
M-0100	Formaldehyde	50-00-0	30.03	0.0017	0.0029	0.23	3.6	9.3	0.020
M-23	Dioxins/Furans				NM	NM	NM	NM	NM
M-23	PAHs				NM	NM	NM	NM	NM
M-25C	Carbon Dioxide	124-38-9	44.01		307000	34900000	559000000	1430000000	3100000
M-25C	Methane	74-82-8	16.04		392000	16300000	260000000	663000000	1500000
M-25C	Oxygen	7782-44-7	32.00		64000	5300000	85000000	220000000	476400
M-40	1,1,2,3,4,4-Hexachloro-1,3-butadiene	87-68-3	260.76	0.0002	0.005	3.4	54	140	0.30
M-40	1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	76-13-1	187.38	0.0002	0.011	5.3	85	220	0.48
M-40	1,1,2-Trichloroethane	79-00-5	133.42	0.0002	0.039	14	220	550	1.2
M-40	1,2,4-Trichlorobenzene	120-82-1	181.46	0.0002	0.00503	2.4	38	96	0.21
M-40	1,2,4-Trimethylbenzene	95-63-6	120.19	0.0002	0.95	290	4700	12000	27
M-40	1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	76-14-2	170.92	0.0002	0.044	19	310	790	1.7
M-40	1,3,5-Trimethylbenzene	108-67-8	120.19	0.0002	0.386	120	1920	4900	10.8
M-40	1,3-Butadiene (Vinylethylene)	106-99-0	54.09	0.0002	0.089	12	200	510	1.1
M-40	1,4-Dioxane (1,4-Diethylene Dioxide)	123-91-1	88.10	0.0002	0.009	2.1	34	87	0.19
M-40	1-Ethyl-4-methylbenzene (4-Ethyl Toluene)	622-96-8	120.20	0.0002	0.386	120	1920	4900	10.8

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Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	4-Methyl-2-pentanone (MIBK)	108-10-1	100.16	0.0002	0.89	230	3700	9400	21
M-40	Benzyl Chloride (Chloromethyl Benzene)	100-44-7	126.58	0.0002	0.020	6.5	110	270	0.59
M-40	Bromomethane (Methyl bromide)	74-83-9	94.95	0.0002	0.046	11	180	460	1.0
M-40	cis-1,2-Dichloroethene	156-59-2	96.94	0.0002	0.292	73.2	1170	2990	6.6
M-40	cis-1,3-Dichloropropene	10061-01-5	110.98	0.0002	0.0014	0.39	6.3	16	0.035
M-40	Cyclohexane	110-82-7	84.16	0.0002	0.734	160	2560	6520	14.4
M-40	Dibromochloromethane	124-48-1	208.29	0.0002	0.0160	8.6	138	352	0.775
M-40	Ethyl Acetate	141-78-6	88.10	0.0002	2.31	526	8430	21500	47.4
M-40	Heptane	142-82-5	100.20	0.0002	0.92	240	3800	9700	21
M-40	Methyl-t-butyl Ether (MTBE)	1634-044	88.15	0.0002	0.177	40.3	646	1650	3.6
M-40	Styrene (Vinylbenzene)	100-42-5	104.14	0.0002	0.222	59.8	957	2440	5.4
M-40	t-1,3-Dichloropropene	1006-02-6	110.98	0.0002	0.003	0.86	14	35	0.078
M-40	Tetrahydrofuran (Diethylene Oxide)	109-99-9	72.10	0.0002	0.88	164	2630	6710	14.8
M-40	Tribromomethane (Bromoform)	75-25-2	252.77	0.0002	ND	ND	ND	ND	ND
M-40	Vinyl Acetate	108-05-4	86.09	0.0002	0.686	153	2450	6230	13.7

5. Quality Assurance/Quality Control

This project produced data that qualified to receive the “A” rating with respect to the rating system described in section 4.4.2 of the *Procedures for preparing Emission Factor Documents* (EPA-454/R-95-015). The cited EPA document provides a clear description of the requirements for an “A” data quality rating. Tests were performed by using an EPA reference test method, or when not applicable, a sound methodology. Tests were reported in enough detail for adequate validation and raw data were provided that could be used to duplicate the emission results presented in this report.

Throughout the results sections of this report, notations and footnotes were included to flag data that, for various reasons, did not meet their associated measurement quality objectives.

5.1 Assessment of Measurement Quality Objectives (MQOs)

Measurement quality objectives (MQOs) were established for each critical measurement and documented in the *Site-Specific QAPP for the Field Evaluation of Landfill Gas Control Technologies-Landfill B*. The following subsections assess MQOs for each measurement to determine if goals were achieved. When applicable, data validation elements performed on laboratory analytical reports are also included.

5.1.1 Continuous Emissions Monitors (CEMs)

Combustion produced gases O₂, CO, CO₂, SO₂, NO_x and THC were measured in the field using CEMs. The following MQOs were established for CEM measurements for Landfill B:

- Direct calibration bias: ±2 percent
- System bias checks: ±5 percent
- Zero and drift: ±3 percent
- Completeness: >90 percent

Direct calibrations were performed daily prior to testing, with certified calibration gases at zero and a minimum of two other concentrations (typically a mid-level concentration and one point towards the full-scale end of the instrument range). System bias checks were performed pre-test and post-test. Drift checks were performed daily, post-test. Table 5-1 summarizes these quality control (QC) checks for all instruments. Not all MQOs were met for all CEM measurements. The SO₂ analyzer

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exhibited excessive bias (1 to 24 percent) and drift (1 to 180 percent). The NO_x instrument also exhibited slightly elevated drift (0 to 13 percent). The other instruments performed well and within the QAPP-specified criteria. The fact that the original QAPP MQOs were not fully met is not believed to affect the usability of these data. Results that did not meet the specified MQOs were presented with the appropriate notations.

Table 5-1. Continuous Emissions Monitor Measurement Quality Objectives Summary for Landfill B

Instrument and Range	Direct Calibration (±2% criteria)			System Bias Checks (±5% criteria)			Drift Checks (±3% criteria)		
	Total (#)	Bias Range (%)	Complete (%)	Total (#)	Bias Range (%)	Complete (%)	Total (#)	Bias Range (%)	Complete (%)
Servomex O ₂ Analyzer (0-21%)	6	0 – 0	100	4	0 – 3.3	100	4	0 – 3.3	75
Cal Analytical CO ₂ Analyzer (0-20%)	6	0 – 2.2	67	4	0 – 3.3	100	4	0 – 2.2	100
Cal Analytical CO Analyzer (0-650 ppm)	8	0 – 0	100	2	0.7 – 2.0	100	4	0 – 1.1	100
Cal Analytical SO ₂ Analyzer (0-500 ppm)	8	0.0 – 1.0	100	2	1 – 24	50	4	1 – 180	50
TECO NO _x Analyzer (0-4000 ppm)	6	0 – 2	100	2	1 – 3	100	4	0 – 13	50
TECO THC Analyzer (0-1000 ppm)	NA ^a	NA ^a	NA ^a	8	0 – 3	100	4	1.1 - 4	50

^aThe method called for calibration gases to be introduced at a point of the sampling system close to the sampling probe for them to flow through the heated sample line. Calibration gases were not injected directly to the analyzer

5.1.2 Carbonyls (Method TO-11)

The following MQOs were established in the QAPP for this method:

- Recovery (formaldehyde): 50-150 percent
- Precision: ±20 percent relative standard deviation (RSD)

- Completeness: >90 percent

Four samples (including three raw LFG samples and one field blank) were submitted to Resolution Analytics for formaldehyde and acetaldehyde determination. Results were reported in RFA# 992014. The report included information on instrument calibration and internal QC checks. Samples collected on November 4 and 5, 2002, were received by the laboratory on November 14, 2002 and analyzed on November 22, 2002. That met the 30-day hold-time limitation. Analytical detection limits were reported as 13 ppb for formaldehyde and 26 ppb for acetaldehyde in the sample extracts. Based on a 5 ml extract, the detection limits were 65 ng for formaldehyde and 130 ng for acetaldehyde. Based on sample volumes ranging from 32 to 42 l at standard conditions, the MDLs were 1.3 ppb for formaldehyde and 1.7 ppb for acetaldehyde.

The field blank did not have detectable levels of acetaldehyde and showed 0.070 μ g formaldehyde detected. To assess accuracy, an external performance evaluation audit sample containing 0.25 ppm formaldehyde and acetaldehyde was analyzed with the sample set. Recovery was 101.6 percent for formaldehyde and 96.3 percent for acetaldehyde, which meets the 50-150 percent MQO. One project sample was injected in duplicate and the percent drift (%D) range for formaldehyde was 4.3 percent and for acetaldehyde was 5.4 percent. All MQOs were met for this method for a completeness of 100 percent.

5.1.3 Hydrogen Sulfide (H₂S) (EPA Method 11)

The following MQOs were established in the Landfill B QAPP for this method:

- Accuracy: \pm 5 percent bias
- Precision: \pm 5 percent RSD
- Completeness: >90 percent

Eight samples (including three reagent blanks and one field blank) plus two laboratory in-house reagent blanks were submitted to Oxford Laboratories for H₂S analysis by EPA Method 11. The samples were collected on November 5, 2002, submitted to the laboratory on November 14, 2002, and the results report was dated November 22, 2002. Therefore the analysis met the 30-day hold time criteria.

The field blank submitted did not have quantifiable concentrations of H₂S. A laboratory spike was performed and the recovery was 101 percent. The three test samples produced results of similar concentrations. Duplicate analysis of a sample within the same batch of samples resulted in 1.7 percent RSD. Spike recovery for the

Run #1 samples was 101 percent. All MQOs were met for this method for a completeness of 100 percent.

5.1.4 Dioxins and Furans (PCDD/PCDFs) (EPA Method 23)

The following MQOs were established in the QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

Four sample sets (including one set of reagent blank and sample train rinsates) were submitted to ALTA Analytical Perspectives for PCDD/PCDFs analysis. The samples were collected on November 4, 2002, and delivered to the laboratory on November 14, 2002. The samples were extracted on November 20, 2002 and analyzed on November 27, 2002. This met the 14-day hold-time for extraction and 40-day hold time for analysis.

The field blank did not have detectable levels of the target analytes. Detection limits for the various congeners were in the single-digit picogram level. To assess accuracy, each sample train was spiked with standard Method 23 spiking compounds and analysis of the samples yielded extraction standard (ES) recovery from 84 to 99 percent. Recovery of sampling standards (SS) ranged from 106 to 108 percent. These recoveries are well within the 50-150 percent MQO.

Because a decision was made to analyze only one of the three sample extracts, the completeness goal of 90% was not achieved. However, all other MQOs were met for this method.

5.1.5 Polycyclic Aromatic Hydrocarbons (PAHs) (EPA Method 23/0011)

5.1.5.1 Raw Landfill Gas (LFG) Samples

Three sets of samples were sent to ALTA Analytical Perspectives for PAH analysis. The Method 23 samples collected from the raw LFG could not be concentrated below 750 to 1000 μ L. The produced cleaned-up extracts contained gasoline-like hydrocarbons and prevented the preparation of final extracts of PAH analysis.

No results were reported. Therefore, the MQOs for this sample group were 0 percent complete.

5.1.5.2 Flare Stack Samples

The following MQOs were established in the QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

Four samples (including one reagent blank) collected from the flare stack were submitted to ALTA Analytical Perspectives for PAH analysis. The report included information on instrument calibration and internal QC checks. Samples collected on November 4, 2002 were received by the laboratory on November 14, 2002. These were extracted on November 20, 2002 and analyzed on January 9, 2003. This met the 14-day hold-time for extraction but missed the analysis 40-day hold time by 10 days. The results were reported with notation of this hold-time exceedance.

Analysis of the field blank yielded detectable but low levels of a few of the target compounds with all PAH analytes totaling to 15762 ng. In contrast, the test samples showed total PAH level of 113974 ng. Recovery of ES ranged from 65 to 124 percent. Recoveries of SS, d₁₀-fluorene and d₁₄-terphenyl were not reported. Recovery of the alternative standard (AS) d₁₀-anthracene was 57.9 percent. The reported recoveries were within the 50 to 150 percent MQO.

Because a decision was made to analyze only one of the three sample extracts, the completeness goal of 90% was not achieved. However, all other MQOs were met for this method.

5.1.6 Polychlorinated Biphenyls (PCBs)

The same Method 23 samples collected from the raw LFG were earmarked for analysis for PCBs. Since the cleaned up extracts could not be concentrated below 750 to 1000 µL because of the presence of gasoline-like hydrocarbons, final extracts could not be prepared for the planned PCB analysis. No PCBs results were reported.

Therefore the MQO for this sample group was 0 percent complete.

5.1.7 Non-Methane Organic Compounds (NMOCs) (Method 25C)

The following MQOs were established in the QAPP for Landfill B:

- Recovery: 50 to 150 percent

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- Precision: ± 30 percent RSD
- Completeness: >90 percent

Four canister samples (including a field blank) were submitted from Landfill B for NMOC analysis by Method 25-C to Triangle Environmental Services. The samples were collected on November 4, 2002, submitted on December 3, 2002, and analyzed between December 3 and 23, 2002. Therefore the analysis did not meet the 30 day hold time requirements. The apparent delay in sample delivery was partly attributed to the fact that the same canisters had to be analyzed by RTP Laboratory for volatile organics first. The impact of exceeding the prescribed 30-day hold time by up to 19 days is unknown. The results were reported with a notation of the hold-time exceedances.

The laboratory report included information on instrument calibration and internal QC checks.

NMOC in the field blank was at 8.5 ppmv as hexane. Accuracy for the method was assessed by evaluating results of response factor check samples that were run prior to and following sample analysis. Acceptance criteria established by the method is that the response factor (RF) must be within 10 percent of the response factor from initial calibration. All response factor checks ranged from 0.9 to 7.4 percent of the initial calibration, well within the 10 percent acceptance criteria. The %D between the pre and post-test checks were less than 2 percent, ranging from 0.5 to 1.2 percent. Samples were run in triplicate and all %RSD for samples were less than 3.4 percent.

All MQOs were met for this method for a completeness of 100 percent.

5.1.8 Hydrogen Chloride (HCl) (EPA Method 26A)

The following MQOs were established in the QAPP for Landfill B:

- Accuracy: ± 10 percent bias
- Precision: ± 10 percent RSD
- Completeness: >90 percent

Four samples (including one field blank) were submitted to Resolution Analytics for HCl and chlorine (Cl_2) determination. The results were reported in RFA# 992014. The report included information on instrument calibration and internal QC checks. Samples were collected on November 4, 2002. These were received by the laboratory on

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November 14, 2002, and analyzed on November 27, 2002, which met the 4 week hold-time requirement. Analytical detection limits were reported as 0.41 ppm HCl.

The field blank did not contain detectable levels of HCl. In-house audit samples were analyzed with each respective group of field samples and the measured concentrations fell within method criteria of 10 percent of their expected values.

A matrix spike was performed on a sample (B POSST-01) that was a part of this sample batch. An 0.8 ml sample was spiked with 0.8 ml of standard (50 ppm chloride) and analyzed in duplicate. The laboratory reported 97.1 percent recovery of the HCl spike with a 0.02 percent deviation in duplicate injections. This meets the MQO of ± 10 percent with very good precision. Calculated bias for internal QC check was < 2.2 percent. All MQOs were met for 100 percent completeness.

5.1.9 Metals (EPA Method 29)

The following MQOs were established in the Landfill B QAPP for this method:

- Accuracy: ± 25 percent bias
- Precision: ± 20 percent RSD
- Completeness: > 90 percent

Four sets of Method 29 Multi-Metal trains (including one field blank) were submitted to First Analytical Laboratories for As, Cd, Cr, Pb, Mn, Hg, and Ni determination. Results were reported in Project #21110. The report included information on instrument calibration and internal QC checks. Samples were collected on November 4 and 5, 2002, received by the laboratory on November 12, 2002, and analyzed on November 14, 2002, which met the 14 day hold-time requirement. Method detection limits for each of the target metals were reported as follows:

- As = 5.0 $\mu\text{g/L}$
- Cd = 0.2 $\mu\text{g/L}$
- Cr = 5.0 $\mu\text{g/L}$
- Pb = 5.0 $\mu\text{g/L}$
- Mn = 5 $\mu\text{g/L}$

- Ni = 10 µg/L
- Hg = 0.2 µg/L

Traces of Cr, Mn and Ni were found in the blanks, which is not unusual.

All samples were spiked prior to analysis. Spike recoveries ranged from 82 to 110 percent and were within the acceptable range of 75-125 percent. In addition to spiking the samples, for each metal, internal calibration verification samples (ICVs) and continuing calibration verification samples (CCVs) were performed. ICVs were run at the beginning of each run set and CCVs were run at a frequency of one for every 10 samples. ICV and CCV measured values were all $< \pm 10$ percent for all metals. Therefore the MQO for this measurement was 100 percent and met the objective set in the QAPP.

5.1.10 Organo-mercury (Hg) and Total mercury (Hg) (Frontier)

The following MQOs were established in the Landfill B QAPP for this method:

- Recovery: 50-150 percent
- Precision: ± 20 percent RSD
- Completeness: > 90 percent

Total Hg analysis was performed by Frontier Geosciences. Four total Hg samples (including a field blank) were taken at Landfill B. Samples were collected on November 4, 2002 and analyzed in December 2002. That analysis schedule exceeded the 14-day hold-time specified in the QAPP. All other quality assurance measures indicated that the analysis of the traps were under good control. All field blanks were consistent with historical values and indicate the detection limit is likely to be at or below the previous estimated value of 50 ng/m³. Spike recoveries were 95.4 and 95.2 percent; and relative percent difference (RPD) between replicates was 6.2 percent, which meets MQOs and are therefore 100 percent complete. The exceedance of 14-day hold times was noted in the reported results.

Five monomethyl Hg (MMHg) samples (including a field blank and field spike) were collected on November 5, 2002. These samples were analyzed December 2005 which exceeded the 14-day hold-time. Analysis of these samples was under good control with acceptable distillation spike recoveries and distillation duplicates. All CCVs had acceptable recoveries. Field spike recovery was 70 percent and matrix spike recovery was 116 percent, which met MQOs. The exceedance of 14-day hold times was noted in the reported results.

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Five dimethyl Hg (DMHg) samples (including a field blank and field spike) were collected on November 4, 2002. Analysis of these samples took place in December 2002 and did not meet the 14-day hold-time. Field spike recoveries for all DMHg analysis were consistently low 0-5 percent. With the extremely low recovery, DMHg concentrations are considered biased low and the degree of bias is significant. QA measures in place support the following conclusions:

- Replicate samples taken at each site report similar concentrations which indicated that the properties of the DMHg sampling train and LFG were consistent and biases were not attributable to trap media or landfill sample gas.
- Continuous calibration verifications (CCVs) used during the analysis indicated that the detection systems were measuring accurately.
- Dimethyl Hg (DMHg) field blanks indicated that the trap media, handling procedures, and analytical techniques did not contribute to the problems with recovery.
- Trip spikes (traps spike in the laboratory, shipped to the field but not used for sampling) indicated that the laboratory standards, trap media, and trap handling procedures did not create significant bias.
- Field spikes (traps spiked in the laboratory and used to collect a replicate sample) indicated that some property or action during sampling either destroyed or evaded the DMHg adsorbed to the Carbotrap

The RSD between the three replicate samples was 23.9 percent, which meets the MQO of ± 30 percent, but because recovery MQOs were not met for any of the field spikes, DMHg analysis was 0 percent complete. The exceedance of 14-day hold times was noted in the reported results. The results were categorized as "R" to indicate that the results were rejected due to serious deficiencies as per EPA QA/G-8 Guidance.

5.1.11 Volatile Organic Compounds (VOCs) and Methane (CH₄) (Method TO-15)

The following MQOs were established in the Landfill B QAPP for this method:

- Accuracy: 50-150 percent recovery
- Precision: ± 30 percent RSD
- Completeness: >90 percent

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Four SUMMA canisters (including one field blank) were submitted from Landfill B to RTP Laboratories for VOC and CH₄ determination by EPA Method TO-15. Results were reported in Project #347-02. Samples were collected on November 2, 2002 and analysis was completed by November 27, 2002, which met the 30 day hold-time requirement.

Analysis of the field blank found 3.03 ppbv of acetone and 1.24 ppbv of methylene chloride. Table 5-2 lists the compounds that were found above the detection limit of 0.2 ppbv. Other target analytes were not detected. The average test sample concentrations were significantly higher than the concentrations in the blank sample. Therefore, the presence of these analytes in the blank sample did not affect the conclusions that were drawn from these VOC data. Nonetheless, the results were reported with the appropriate notations.

The summa canister of the Run #3 sample was spiked to 213 ppbv of chlorobenzene. The recovery of chlorobenzene was 211 percent and was outside of the established criteria. This out-of-criteria spike recovery was noted in the reported results.

Precision was demonstrated through multiple injections of standards at five concentration levels. The RSD between the calculated relative response factors (RRF) must be <30 percent with allowances that two may be >40 percent. The average RSD was 10.18 percent and method criteria were met for all compounds except methylene chloride with an RSD of 37.9 percent. Results for this compound are flagged as estimated, "J". Valid data was received for all SUMMA canisters submitted, and these analyses were considered to be 100 percent complete.

5.2 Audits

This project was designated as Quality Assurance (QA) Category II effort. Hence, audits were required. The internal and external audits performed for this project were completed and their findings were included in a separate report for Landfill D of this project.

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Table 5-2. VOC detected in Method 40 Blank Sample and Test Samples

Compound	Concentration, (ppbv)	Average Concentration in Test Samples (ppbv)
Vinyl chloride	0.27	410
1,3-Butadiene	0.41	89
Bromomethane	0.92	46
Isopropyl alcohol	0.26	356
Methylene chloride	1.24	169
Acetone	3.03	1610
Benzene	0.21	251
Toluene	0.21	6770
4-Methyl-2-pentanone (MIBK)	0.25	886
1,2,4-trimethylbenzene	0.22	949
1,4-dichlorobenzene	0.21	255
1,1,2,3,4,4-hexachloro-1,3-butadiene	0.5	5
1,2,4-trichlorobenzene	0.34	5

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**Field Test Measurements at Five Municipal Solid
Waste Landfills with Landfill Gas Control Technology
Final Report**

Appendix C

**SOURCE TEST REPORT
FOR LANDFILL C**

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- A. Method TO-15 (VOCs, TICs, C2, C3, C4, C5, C6)
- B. Method 25C (CH₄, CO₂, NMOC)
- C. Method 3C (O₂, N₂, CH₄, CO₂)
- D. Method TO-11 (Formaldehyde, Acetaldehyde)
- E. Organic mercury Method (Mercury, Total, Monomethyl, Dimethyl)
- F. LUMEX (Elemental Mercury)
- G. Hydrogen Sulfide
- H. Continuous Emission Monitor (Data and Charts)
- I. Method 23 (PAH)
- J. Method 23 (PCDD/PCDF)
- K. Method 23 (PAH, PCDD/PCDF)
- L. Method 29 (Metals)
- M. Method 26A (HCl)
- N. Analyte Concentration and Mass Flow Rate Computation Worksheets
- P. Raw Field Data Records
- Q. CEM Calibration Records and Span Gas Certification
- R. Sampling Control Meter Boxes Calibration Record

Acronym List

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Acronym List

Acronym List

%D	Percent difference
AP-42	Compilation of Air Pollutant Emission Factors
APPCD	Air Pollution Prevention Control Division
ARCADIS	ARCADIS G&M, Inc.
As	Arsenic
CCVs	Continuing calibration verification samples
Cd	Cadmium
CEMS	Continuous emission monitoring system
CH ₄	Methane
Cl ₂	Chlorine
CO	Carbon monoxide
CO ₂	Carbon dioxide
Cr	Chromium
DMHg	Dimethyl mercury
EF	Efficiency factor
EPA	US Environmental Protection Agency
ES	Extraction standards
FID	Flame ionization detector
Frontier	Frontier Geosciences
GC/MS	Gas chromatograph/mass spectrometer
HCl	Hydrogen chloride
Hg	Mercury
H ₂ S	Hydrogen sulfide
ICVs	Internal calibration verification samples
LFG	Landfill gas
MMHg	Monomethyl mercury
Mn	Manganese
MQOs	Measurement quality objectives

Acronym List

MSW	Municipal solid waste
Ni	Nickel
NIST	National Institute of Standards and Technology
NMOCs	Non-methane organic compounds
NO _x	Nitrogen oxides
O ₂	Oxygen
PAHs	Polynuclear aromatic hydrocarbons
Pb	Lead
PEA	Performance evaluation audit
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality control
RF	Response factor
RPD	Relative percent difference
RRF	Relative response factors
RSD	Relative standard deviation
RTP	Research Triangle Park
SO ₂	Sulfur dioxide
SOPs	Standard operating procedures
SVOC	Semi-volatile organic compounds
TCDD/TCDFs	Dioxins/furans
TEQ	Toxicity Equivalent
THCs	Total hydrocarbons
TICs	Tentatively identified compounds
TSA	Technical systems audit
VOCs	Volatile organic compounds

1. Introduction

Large municipal solid waste (MSW) landfills are subject to Clean Air Act regulations because of concerns related to their emissions and their potential adverse effects to human health and the environment. Landfills are listed as a source of air toxics in the Urban Air Toxics Strategy for future evaluation of residual risk. Existing emission factors for landfill gas (LFG) were largely developed using data from the 1980s and early 1990s. A database was developed summarizing data from approximately 1,200 landfills, along with emissions information from literature and test reports prepared by state and local government agencies and industry. These data were summarized in *Compilation of Air Pollutant Emission Factors (AP-42)*, Chapter 2.4. The final rule and guidelines are contained in 40 CFR Parts 51, 52, and 60, *Standards of Performance for New Stationary Sources and Guidelines for Control of Existing Sources: Municipal Solid Waste Landfills*.

The overall purpose of this testing program was to generate data to be used to update AP-42 and include data that reflect current waste management operating practices. This report presents the results of a field test conducted at Landfill C. Testing took place on May 13 and 14, 2004.

The site uses two internal combustion engine/electric generator sets to reclaim the energy content in the landfill gas. A standby enclosed flare is used for the destruction of any excess landfill gases not consumed by the engine/generator-sets. A more detailed description of the engine system is presented in Section 2. The specific purpose of the testing program was to determine the gas concentrations in the landfill gas pipe leading to the engines and the enclosed flare, and gas emissions from the stack of one of the engines. The pollutants of interest for the raw untreated landfill gas were volatile organic compounds (VOCs), non-methane organic compounds (NMOCs), hydrogen sulfide (H₂S), carbonyls (acetaldehyde, formaldehyde), and mercury (Hg) compounds. The pollutants of interest for the treated LFG, in this case at the engine stack, were carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), NMOCs as total hydrocarbons (THCs), hydrogen chloride (HCl), dioxins/furans (PCDD/PCDFs), polycyclic aromatic hydrocarbons (PAHs), total Hg, and metals.

ARCADIS G&M, Inc. (ARCADIS), as contractor to the US Environmental Protection Agency's (EPA) Air Pollution Prevention and Control Division (APPCD), performed this work under Work Assignment 0-27 of the Onsite Laboratory Support Contract. The testing activities followed the specifications of the approved "*Site-Specific Quality Assurance Project Plan for the Field Evaluations of Landfill Gas Control Technologies Landfill C.*"

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2. Landfill Facility Descriptions

Landfill C is located in a midwestern industrial state and began operation in 1992. Based on information provided by the site operator, Landfill C has approximately 6,400,000 tons of waste in place as of August 2004, covering an area of 63 acres.. The LFG generated in the landfill was extracted with 54 vertical wells, at a rate of 600 cfm. All collected LFG was piped to the engines and enclosed flare system where it was combusted.

2.1 Landfill Gas (LFG) Destruction Process Description and Operation

Figure 2-1 shows a simplified process schematic of the engine and flare system. Landfill C utilizes a bank of two Caterpillar generator-sets for destruction of LFG and generation of electricity. The engines were Caterpillar 3516 four-stroke spark ignition (SI) engines, adapted for LFG fuel. The Caterpillar 3516 was a spark-ignited V-16 engine with 4210 cubic inches displacement. The engine was turbocharged and after-cooled, and had a 6.7-inch diameter cylinder bore and a 7.5-inch stroke. A Caterpillar SR4 Generator rated at 800KW (at a 0.8 power factor) was driven by the engine. Engine #1 was selected arbitrarily and tested.

2.2 Control Equipment Description

The engines did not have pollution control equipment installed.

2.3 Excess Landfill Gas (LFG) Flare

A John Zink Enclosed Ground Flare Station received and destroyed any excess LFG not needed by the two engines. The Enclosed Ground Flare was not part of this test program.

A condensate removal system prevented liquids from entering into the engine and flare burners. A flame arrestor prevented flame from propagating from the flare burner array back into the LFG collection and flow control system.

2.4 Landfill Gas (LFG) Sampling Locations

Gas sampling was conducted at the raw LFG pipe, which fed the engines and flare, and at Engine #1 stack as shown in Figure 2-1.

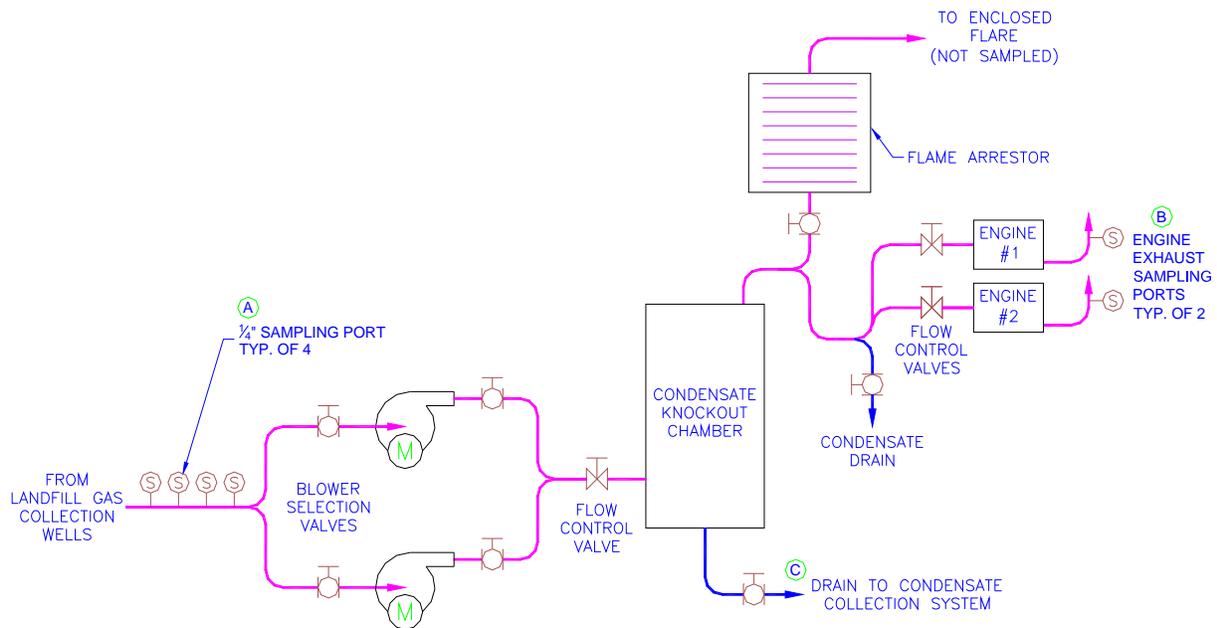


Figure 2-1. Simplified Engine and Flare Process Flow Diagram and Sampling Points

2.4.1 Landfill Gas (LFG) Header Pipe

Raw LFG samples were collected from the header pipe, which was exposed by excavating the soil around it. The sample ports were upstream of any processing units. Figure 2-2 is a photograph of the raw LFG inlet pipe. The pipe was 14 inches in diameter. At the sampling point, four 1/4" gas taps were installed on the top of the horizontal pipe, at approximately 12-inch spacing. Through these ports, gases were withdrawn to obtain the test samples.

2.4.2 Engine #1 Stack

A picture of Engine #1 is shown in Figure 2-3. The exhaust gas of the engine was ducted outside of the engine room via a pipe. The engine stack was 10 inches in diameter and had two 4-inch sampling ports installed 90 degrees apart. Figure 2-4 is a schematic of the engine stack and includes the locations of the sample traverse points. Isokinetic sampling was possible at this location and followed.

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Figure 2-2. Raw Landfill Gas Collection Pipe



Figure 2-3. Engine/Generator Set #1

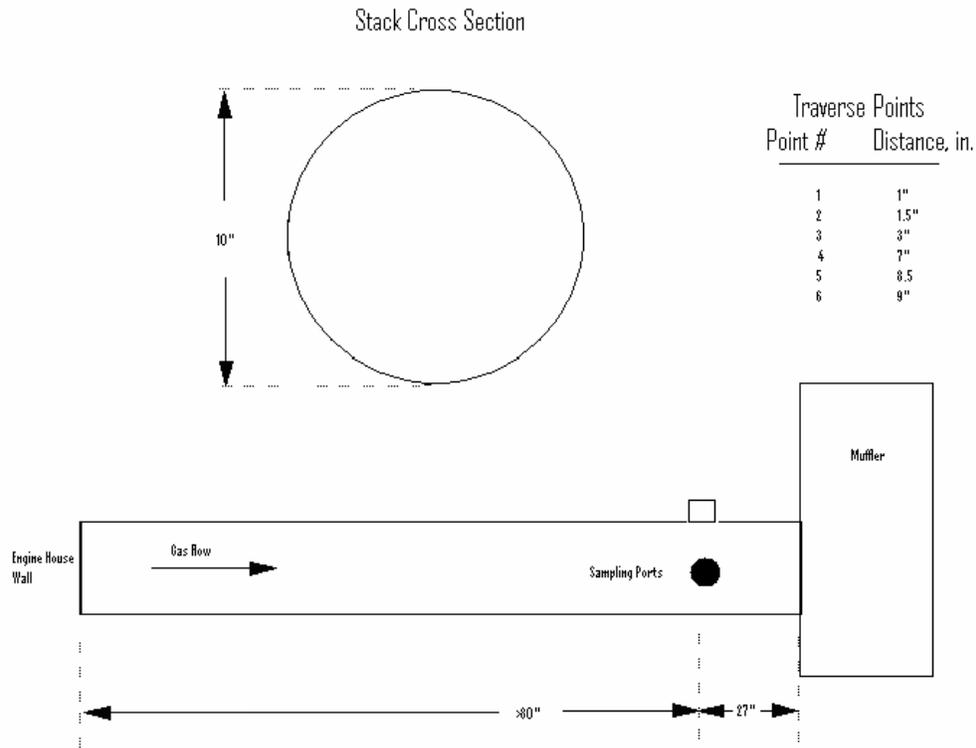


Figure 2-4. Engine Stack Dimension and Sampling Traverse Locations

3. Test Operations

As stated previously, the purpose of the sampling program was to determine the chemical composition of the raw LFG pipe and the emission from an engine stack.

3.1 Test Team

The tests were conducted by a team of seven individuals. The team members and their primary duties are listed in Table 3-1.

Table 3-1. Test Team Members and Responsibilities

Role	Primary Duty
Test Engineer	Field Supervisor
Test Engineer	CEM operator
Test Engineer	Sample train preparation and recovery
Test Engineer	Sample train operator at raw LFG inlet pipe
Sampling Technician	Sample train operator at stack
Senior Chemist	Mercury measurements
Senior Chemist	Mercury measurements
Project Officer	Field Observer
Quality Assurance Officer	QA Technical Systems Audit
Quality Assurance Officer	QA Technical Audit Liaison and Oversight

3.2 Test Log

3.2.1 Planned Test Sample Matrices

The list of target samples to be collected and measurements to be conducted are specified in the Quality Assurance Project Plan (QAPP) Revision 1 dated March 2004. These are reiterated here for completeness. Table 3-2 lists the target compounds of interest for the raw LFG, collected at the raw LFG pipe. Table 3-3 lists the target compounds of interest for the treated gas, at the engine stack.

Table 3-2. Target Analytes for the Raw Landfill Gas Stream

Volatile compounds	Volatile compounds (continued)	Carbonyls
Methane	Ethylene dibromide	Acetaldehyde
Ethane	Ethylene dichloride	Formaldehyde
Propane	Methyl chloroform	
Butane	Methyl isobutyl ketone	Mercury
Pentane	Methylene chloride	Organo-mercury compounds
Hexane	Propylene dichloride	Total
Carbonyl sulfide	t -1,2-Dichloroethene	Elemental
Chlorodifluoromethane	Tetrachloroethene	
Chloromethane	Toluene	Gases
Dichlorodifluoromethane	Trichlorethylene	Carbon dioxide
Dichlorofluoromethane	Vinyl chloride	Oxygen
Ethyl chloride	Vinylidene chloride	
Fluorotrichloromethane	Ethanol	
1,3-Butadiene	Methyl ethyl ketone	
Acetone	2-Propanol	
Acrylonitrile	1,4-Dichlorobenzene	
Benzene	Ethylbenzene	
Bromodichloromethane	Xylenes	
Carbon disulfide		
Carbon tetrachloride		
Chlorobenzene	Non-methane organic compounds	
Chloroform		
Dimethyl sulfide	Reduced sulfur compounds	
Ethyl mercaptan	Hydrogen sulfide	

3.2.2 Landfill Gas (LFG) Pipe (Inlet)

Sample collection took two days to complete. Table 3-4 lists the samples that were collected from the raw LFG pipe. Figure 3-1 is a photograph of the sampling team in action at this sample location.

Table 3-3. Target Analytes for the Engine Stack Gas Stream

Gases	Dioxins/Furans
Oxygen	Polycyclic aromatic hydrocarbons
Carbon dioxide	
Carbon monoxide	
Nitrogen oxide	Mercury
Sulfur dioxide	Total
Total hydrocarbons	
Non-methane organic compounds	Metals
	Lead, arsenic, cadmium, chromium, manganese, nickel
Hydrogen chloride	



Figure 3-1. Sampling Operations at the Raw Landfill Gas Pipe Inlet

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Table 3-4. Raw Landfill Gas Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 40 (TO-15, 25C, 3C)					
	C-Pre-M40-051204-FB	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Field Blank	5/12/04	13:06 – 14:03
	C-Pre-M40-051304-01	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	5/13/04	09:36 – 10:32
	C-Pre-M40-051304-02	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	5/13/04	12:44 – 13:35
	C-Pre-M40-051304-03	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	5/13/04	15:00 – 15:59
EPA Method 0100					
	C-Pre-M0100-051304-FB	Carbonyls	Field Blank	5/13/04	13:04 – 13:24
	C-Pre-M0100-051304-01	Carbonyls	Test	5/13/04	13:22 – 13:54
	C-Pre-M0100-051304-02	Carbonyls	Test	5/13/04	14:34 – 15:06
	C-Pre-M0100-051304-03	Carbonyls	Test	5/13/04	15:25 – 15:56
EPA Method 11					
	C-Pre-M0011-051304-FB	H ₂ S	Field Blank	5/13/04	Not recorded
	C-Pre-M011-051304-01	H ₂ S	Test	5/13/04	09:50 – 11:01
	C-Pre-M011-051304-02	H ₂ S	Test	5/13/04	11:13 – 11:24
	C-Pre-M011-051304-03	H ₂ S	Test	5/13/04	11:55 – 12:06
Lumex Instrument		Hg			
	C-Pre-EM-051204-01	Elemental Hg ^a	Test	5/12/04	14:29
	C-Pre-EM-051304-02	Elemental Hg ^a	Test	5/13/04	11:28
	C-Pre-EM-051304-03	Elemental Hg ^a	Test	5/13/04	14:56
	C-Pre-EM-051304-04	Elemental Hg ^a	Test	5/13/04	17:20
Frontier					
	040513-BR-STM2 BIK	Total gaseous Hg	Field Blank	5/13/04	12:10
	C – 052104 - 01	Total gaseous Hg	Blind Spike		Not recorded
	040513-BR-STM1	Total gaseous Hg	Test	5/13/04	09:40 – 10:49
	040513-BR-STM3	Total gaseous Hg	Test	5/13/04	11:43 – 12:45
	040513-BR-STM4	Total gaseous Hg	Test	5/13/04	13:13 – 14:08
Frontier					
	040513-BR-MHg8	Monomethyl Hg	Field Spike	5/13/04	17:02 – 17:47
	040513-BR-MHg7	Monomethyl Hg	Blind Spike	5/13/04	15:32

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
	040513-BR-MHg2	Monomethyl Hg	Field Blank	5/13/04	11:10
	040513-BR-MHg1	Monomethyl Hg	Test	5/13/04	09:42 – 10:38
	040513-BR-MHg3	Monomethyl Hg	Test	5/13/04	11:46 – 12:40
	040513-BR-MHg4	Monomethyl Hg	Test	5/13/04	13:14 – 14:09
	040513-BR-MHg5	Monomethyl Hg	Test	5/13/04	14:59 – 15:52
Frontier					
	ARCADIS DMM Spike #1	Dimethyl Hg	Blind Spike	5/13/04	Not recorded
	ARCADIS DMM Spike #2	Dimethyl Hg	Blind Spike	5/13/04	Not recorded
	040513-BR-DMHg4	Dimethyl Hg	Field Blank	5/13/04	16:30
	040513-BR-DMHg5	Dimethyl Hg	Trip Spike	5/13/04	17:38 – 17:40
	040513-BR-DMHg6	Dimethyl Hg	Trip Spike	5/13/04	Not recorded
	040513-BR-DMHg1	Dimethyl Hg	Test	5/13/04	13:41 – 13:43
	040513-BR-DMHg2	Dimethyl Hg	Test	5/13/04	14:37 – 14:45
	040513-BR-DMHg3	Dimethyl Hg	Test	5/13/04	15:15 – 15:18

^a Represents average of 3 readings, each 30-seconds in duration

3.2.3 Engine Stack

Sampling at the engine stack was conducted by accessing the sampling ports with the aid of a scaffold. Figure 3-2 shows the engine and the sampling scaffold platform.

The engine stack was sampled for NMOCs (as THC_s), PCDD/PCDFs, PAHs, HCl, metals (lead [Pb], arsenic [As], cadmium [Cd], chromium [Cr], manganese [Mn], nickel [Ni]), total Hg, SO₂, NO_x, CO, carbon dioxide (CO₂), and (O₂). Table 3-5 lists the test samples that were collected from the engine stack.

The engine stack cross-section was divided into 6 equal areas for sample collection according to EPA Method 1. Sampling at the engine stack was conducted at isokinetic conditions except for the Method 26A samples which were extracted proportionally. Sample collection times for the Method 29 metals train were 60-minutes. Run time for the Method 23 PCDD/PCDFs trains was 180 minutes. Run time for the Method 26A HCl trains and the continuous emissions monitoring system (CEMS) parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) varied.



Figure 3-2. Engine #1 Stack and Sampling Scaffold

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Table 3-5. Engine Stack Test Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 3A (CEM)					
	C-Post-M3A-051304-01	O ₂	Test	5/13/04	12:38 – 13:37
	C-Post-M3A-051304-01	O ₂	Test	5/13/04	16:13 – 17:12
	C-Post-M3A-051304-01	O ₂	Test	5/13/04	17:57 – 18:56
	C-Post-M3A-051404-01	O ₂	Test	5/14/04	10:28 – 11:27
	C-Post-M3A-051404-01	O ₂	Test	5/14/04	17:32 – 18:32
EPA Method 3A (CEM)					
	C-Post-M3A-051304-01	CO ₂	Test	5/13/04	12:38 – 13:37
	C-Post-M3A-051304-01	CO ₂	Test	5/13/04	16:13 – 17:12
	C-Post-M3A-051304-01	CO ₂	Test	5/13/04	17:57 – 18:56
	C-Post-M3A-051404-01	CO ₂	Test	5/14/04	10:28 – 11:27
	C-Post-M3A-051404-01	CO ₂	Test	5/14/04	17:32 – 18:32
EPA Method 10 (CEM)					
	C-Post-M10-051304-01	CO	Test	5/13/04	12:38 – 13:37
	C-Post-M10-051304-01	CO	Test	5/13/04	16:13 – 17:12
	C-Post-M10-051304-01	CO	Test	5/13/04	17:57 – 18:56
	C-Post-M10-051404-01	CO	Test	5/14/04	10:28 – 11:27
	C-Post-M10-051404-01	CO	Test	5/14/04	17:32 – 18:32
EPA Method 7E (CEM)					
	C-Post-M7E-051304-01	NO _x	Test	5/13/04	12:38 – 13:37
	C-Post-M7E-051304-01	NO _x	Test	5/13/04	16:13 – 17:12
	C-Post-M7E-051304-01	NO _x	Test	5/13/04	17:57 – 18:56
	C-Post-M7E-051404-01	NO _x	Test	5/14/04	10:28 – 11:27
	C-Post-M7E-051404-01	NO _x	Test	5/14/04	17:32 – 18:32
EPA Method 6C (CEM)					
	C-Post-M6C-051304-01	SO ₂	Test	5/13/04	12:38 – 13:37
	C-Post-M6C-051304-01	SO ₂	Test	5/13/04	16:13 – 17:12
	C-Post-M6C-051304-01	SO ₂	Test	5/13/04	17:57 – 18:56
	C-Post-M6C-051404-01	SO ₂	Test	5/14/04	10:28 – 11:27

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
	C-Post-M6C-051404-01	SO ₂	Test	5/14/04	17:32 – 18:32
EPA Method 25A (CEM)					
	C-Post-M25A-051304-01	NMOCs (THC)	Test	5/13/04	12:38 – 13:37
	C-Post-M25A-051304-01	NMOCs (THC)	Test	5/13/04	16:13 – 17:12
	C-Post-M25A-051304-01	NMOCs (THC)	Test	5/13/04	17:57 – 18:56
	C-Post-M25A-051404-01	NMOCs (THC)	Test	5/14/04	10:28 – 11:27
	C-Post-M25A-051404-01	NMOCs (THC)	Test	5/14/04	17:32 – 18:32
Lumex Instrument					
	C-Post-EM-051304-01	Elemental Hg ^a	Test	5/13/04	11:13
	C-Post-EM-051304-02	Elemental Hg ^a	Test	5/13/04	14:38
	C-Post-EM-051304-03	Elemental Hg ^a	Test	5/13/04	17:40
EPA Method 26A					
	C-Post-M26-051404-FB	HCl	Field Blank		Not recorded
	C-Post-M26-051404-01	HCl	Test	5/14/04	15:41 – 16:13
	C-Post-M26-051404-02	HCl	Test	5/14/04	17:11 – 18:01
	C-Post-M26-051404-03	HCl	Test	5/14/04	18:26 – 19:06
EPA Method 23					
	C-Post-M23-051304-FB	PCDD/PCDFs, PAHs	Field Blank	5/13/04	16:30
	C-Post-M23-051304-01	PCDD/PCDFs, PAHs	Test	5/13/04	12:09 – 15:19
	C-Post-M23-051304-02	PCDD/PCDFs, PAHs	Test	5/13/04	15:54 – 19:15
	C-Post-M23-051404-03	PCDD/PCDFs, PAHs	Test	5/14/04	15:27 – 18:52
EPA Method 29					
	C-Post-M29-051404-FB	Metals	Field Blank	5/14/04	Not recorded
	C-Post-M29-051404-01	Metals	Test	5/14/04	09:25 – 10:35
	C-Post-M29-051404-02	Metals	Test	5/14/04	11:07 – 12:27
	C-Post-M29-051404-03	Metals	Test	5/14/04	12:29 – 13:39

^a Represents 3 readings, each 30-seconds in duration

**3.3 Field Test Changes and Deviations from Quality Assurance Project Plan (QAPP)
Specifications**

3.3.1 Variation from Test Methods or Planned Activities

3.3.1.1 *Sampling at the Raw Landfill Gas (LFG) Pipe*

There were not variations from test methods or planned activities on the raw LFG pipe.

3.3.1.2 *Landfill Gas (LFG) Inlet Pipe Condensate Sample*

A raw LFG pipe condensation sample was not specified in the plan and was not collected.

3.3.1.3 *Landfill Gas (LFG) Flow Rate Measurement*

Gas flow as indicated by the LFG flow control station was recorded. The accuracy of the flow rate measurement could not be independently verified because of the inability to measure gas velocity accurately. Access to the raw LFG pipe was via ¼” ports, which were too small for method-specified velocity probes. The test team was able to make crude velocity measurements by inserting velocity probes part-way into the gas pipe. The accuracies of these measurements were uncertain, but they appeared to be similar to the facility’s flow rate readings.

3.3.1.4 *Engine #1 Stack*

Unforeseen conditions necessitated two deviations from the QAPP-specified sampling procedures.

One testing day was lost because of local electrical utility failure and engine problems. In order to complete the tests within the remaining time and available funds, the HCl test method was changed from EPA Method 26A, an isokinetic traversing procedure, to EPA Method 26, a single-point proportional procedure. This change allowed HCl sampling to be done simultaneously with the EPA Method 29 metals sampling train because inter-train probe interference was avoided. Since isokinetic sampling is only required for sampling particulate-laden gases, the absence of particulate matter in the engine exhaust is believed to be an acceptable alternative non-isokinetic sampling method and would not result in sampling errors.

Secondly, because of error in received information on the engine stack diameter (10-inch actual instead of 12-inch reported previously), substituting EPA Method 1A for EPA Method 1 for sampling traverse point determination was necessary. Consequently, EPA Method 2C was substituted for EPA Method 2 for determination of engine stack velocity. A second set of sampling ports was installed to accommodate this change.

3.3.2 Application of Test Methods

Except for the deviations outlined above and immediately following, the sampling and analytical methods used in this test program followed those specified in the QAPP. Sampling methods are shown in Table 3-6.

Table 3-6. Sampling Methods

Procedure	Description	Organization Performing Analysis
EPA Method 1A	Selection of engine stack traverse points	ARCADIS G&M
EPA Method 2C	Determination of engine stack gas velocity and volumetric flow rate	ARCADIS G&M
EPA Method 3A	Determination of engine stack oxygen (O ₂) and carbon dioxide (CO ₂) for gas molecular weight calculations	ARCADIS G&M
EPA Method 3C	Determination of raw LFG carbon dioxide (CO ₂), methane (CH ₄), nitrogen (N ₂), and oxygen (O ₂) in raw LFG	Triangle Environmental Services
EPA Method 4	Determination of engine stack gas moisture	ARCADIS G&M
EPA Method 6C	Determination of engine stack sulfur dioxide (SO ₂)	ARCADIS G&M
EPA Method 7E	Determination of engine stack nitrogen oxides (NO _x)	ARCADIS G&M
EPA Method 10	Determination of engine stack carbon monoxide (CO)	ARCADIS G&M
EPA Method 11	Determination of raw LFG hydrogen sulfide (H ₂ S)	Oxford Laboratories
EPA Method 23	Determination of engine stack: PCDD/PCDFs by Method 8290 Polycyclic aromatic hydrocarbons (PAHs) by Method 8270	ALTA Analytical Perspectives
EPA Method 25A	Determination of engine stack gas non-methane organic carbons (NMOCs) (as THCs) when total organic concentration is less than the 50 ppm Method 25C applicability threshold	ARCADIS G&M

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Procedure	Description	Organization Performing Analysis
EPA Method 25C	Determination of raw LFG NMOCs	Triangle Environmental Services
EPA Method 26	Determination of engine stack hydrogen chloride (HCl)	Resolution Analytics
EPA Method 29	Determination of engine stack metals	First Analytical Laboratories
EPA Method 40/TO-15	Determination of raw LFG volatile organic carbons (VOCs)	Research Triangle Park Laboratories
SW-846 Method 0100/TO-11	Determination of raw LFG carbonyls (formaldehyde, acetaldehyde)	Resolution Analytics
LUMEX instrument	Determination of raw LFG and engine stack elemental mercury (Hg ⁰)	ARCADIS G&M
Organic mercury methods	Determination of raw LFG: Monomethyl mercury Dimethyl mercury Total mercury	Frontier Geosciences

3.3.3 Test Method Exceptions

Laboratory analytical procedures followed those prescribed by the specified methods, with the following engine stack exceptions:

- Non-methane organic compounds (NMOCs) - Method 25A was used instead of the specifically applicable Method 25C.

- Polycyclic aromatic hydrocarbons (PAH) were analyzed by CARB Method 429 as opposed to Method 8270. However, these methods are comparable. CARB Method 429 contains procedures for sampling, sample recovery, clean-up, and analysis. Method 8270 is strictly an analytical method. CARB Method 429 is specific to 19 PAHs, the target analytes of this portion of the specified tests. The 19 PAHs are a subset of the 200+ target analytes listed for Method 8270 for semi-volatile organic compounds (SVOCs). Though specific compounds called out for use in instrument performance verifications, internal standard preparation, surrogate standards, and continuing calibration verifications/calibration checks are slightly different, both methods require them. CARB Method 429 adds another level of quality control (QC) with a required recovery standard. Method performance and acceptance criteria for recoveries are better defined in CARB Method 429 and meet or exceed those stated in Method 8270C. As long as any additional compounds reported by the laboratory using CARB Method 429 are included in the calibration standards

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and acceptable response factors (RFs) are demonstrated, using CARB Method 429 is essentially equivalent to using SW-846 Method 8270.

4. Presentation of Test Results

Testing took place at Landfill C on May 13-14, 2004. Results of the testing are presented in this section. Detailed test results are included in the Appendices. The following subsections provide concise summaries of the test results.

4.1 Raw Landfill Gas (LFG) Results

As depicted in Figure 2-2, sampling was conducted by extracting samples via the four ¼-inch ports installed in the raw LFG pipe.

4.1.1 Raw Landfill Gas (LFG) Flow Rate and Temperature

4.1.1.1 *Direct Measurements*

The facility process system had a flow measurement system, which displayed the flow rate on an instrument panel meter. The panel meter displayed the gas flow rate to both engines only and was taken after gas drying. With both engines running, the meter read between 547 and 598 scfm during the tests, averaging at 574 scfm. During several periods when Engine # 2 was down and only Engine #1 was running, the panel meter indicated gas flow rate averaging at 299.5 scfm, within 2 percent deviation.

The small size of the sampling ports precluded full method-compliant measurement of the velocity profile all the way across the inlet gas pipe. Nonetheless, measurements with a velocity probe returned readings ranging from 634 ft/min to 824 ft/min (wet). At these velocities and with pipe inside diameter of 14 inches, the volumetric flow rate was estimated to be about 700 scfm. Vacuum at the raw LFG inlet gas stream was at approximately 21 inch water column.

A direct measurement with thermocouples showed the raw LFG temperature to be 56°F.

4.1.1.2 *Raw Landfill Gas (LFG) Flow Rate Combined Estimate*

Based on the two independent sources of the flow rate estimates, 574 scfm by the facility's flow rate indicator and 700 scfm by the crude pitot probe measurement, an average value would be 637 scfm. Clearly, the value is only an estimate. Hence, any mass emission rates calculated based on this raw LFG flow rate will also, by necessity, have to be recognized as estimates.

4.1.2 Raw Landfill Gas (LFG) Constituents

The concentrations of the constituents of interest in the raw LFG are presented in the Subsections 4.1.2.1 through 4.1.2.5. Following the presentation of the constituent concentrations, Section 4.3 summarizes the data and presents a comparison with the AP-42 values. The section also presents the estimated mass flow rates of the constituents at the raw LFG pipe.

4.1.2.1 Volatile Organic Compounds (VOCs)

Concentrations of VOCs were obtained collecting summa canister samples using Method 40 procedures. Analysis was performed by Method TO-15, with gas chromatography and mass spectrometry (GC/MS). The alkanes (C2 through C6), being present in much higher concentrations, were analyzed by GC flame ionization detection (FID) on the same summa canister samples.

Table 4-1 lists the results of these analyses. Tentatively identified compounds (TICs) can be seen in the Research Triangle Park (RTP) Laboratory reports in Appendix A.

Table 4-1. Raw Landfill Gas VOC Concentrations

Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
<u>By GC/FID</u>						
Ethane	ppmv	1	15.5	12.2	15.3	14.3
Propane	ppmv	1	39.6	39.5	40.8	40.0
Butane	ppmv	1	23.9	27.9	61.9	37.9
Pentane	ppmv	1	26.4	23.4	29.9	26.6
Hexane	ppmv	1	28.4	26.7	30.0	28.4
<u>By TO-15 GC/MS</u>						
Dichlorodifluoromethane (Freon 12)	ppbv	0.3	2270	1820	720	1600
1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	ppbv	0.2	166	149	66	127
Chloromethane	ppbv	0.1	3790	ND	ND	1263
Vinyl chloride	ppbv	0.2	6	1620	679	768
1,3-Butadiene ((Vinylethylene)	ppbv	0.3	891	709	325	642
Bromomethane (Methyl Bromide)	ppbv	0.2	6	57	7	23

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
Chloroethane (Ethyl Chloride)	ppbv	0.2	50000	39200	2000	30400
Trichloromonofluoromethane (CFC11)	ppbv	0.2	721	572	218	504
1,1-Dichloroethene	ppbv	0.2	79	62	25	55
1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	ppbv	0.2	53	44	21	39
Carbon Disulfide	ppbv	0.3	197	180	93	157
Ethanol	ppbv	0.2	225	222	68	172
Isopropyl Alcohol (2-Propanol) ^c	ppbv	0.2	2060	1530	250	1280
Methylene chloride (Dichloromethane) ^c	ppbv	0.1	8010	6750	1280	5350
Acetone ^c	ppbv	0.3	17700	14100	3300	11700
t-1,2-dichloroethene	ppbv	0.3	57	46	22	42
Hexane	ppbv	0.3	6180	5480	3150	4940
Methyl-t-butyl ether (MTBE)	ppbv	0.3	405	337	28	257
1,1-Dichloroethane	ppbv	0.4	ND	660	608	423
Vinyl Acetate	ppbv	0.5	38	3	30	24
cis-1,2-Dichloroethene	ppbv	0.3	2240	1780	900	1640
Cyclohexane	ppbv	0.3	4560	3700	1650	3300
Chloroform	ppbv	0.3	1000	825	403	744
Ethyl Acetate	ppbv	0.3	1970	ND	2290	1420
Carbon Tetrachloride	ppbv	0.5	ND	ND	ND	ND
Tetrahydrofuran (Diethylene Oxide) ^c	ppbv	0.4	1140	545	1830	1170
1,1,1-Trichloroethane	ppbv	0.3	ND	ND	ND	ND
2-Butanone (Methyl Ethyl Ketone) ^c	ppbv	0.3	7150	6550	ND	4570
Heptane ^c	ppbv	0.2	3510	3240	1820	2860
Benzene	ppbv	0.2	2140	1790	950	1630
1,2-Dichloroethane	ppbv	0.3	62	49	ND	37
Trichloroethylene (Trichloroethene)	ppbv	0.2	841	674	31	515
1,2-Dichloropropane	ppbv	0.3	ND	ND	ND	ND
Bromodichloromethane	ppbv	0.2	ND	ND	ND	ND
1,4-Dioxane (1,4-Diethylene Dioxide)	ppbv	0.2	3	7	10	7
cis-1,3-Dichloropropene	ppbv	0.2	ND	ND	ND	ND
Toluene (Methyl Benzene) ^c	ppbv	0.3	27400	24700	18000	23300
4-Methyl-2-pentanone (MIBK) ^c	ppbv	0.2	3280	2850	390	2170
t-1,3-Dichloropropene	ppbv	0.2	40	35	23	33

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
Tetrachloroethylene (Perchloroethylene) ^c	ppbv	0.3	2310	1900	860	1690
1,1,2-Trichloroethane ^c	ppbv	0.2	675	660	ND	445
Dibromochloromethane	ppbv	0.2	13	11	2	9
1,2-Dibromoethane (Ethylene dibromide)	ppbv	0.2	33	29	ND	21
2-Hexanone (Methyl Butyl Ketone)	ppbv	0.2	ND	ND	ND	ND
Ethylbenzene ^c	ppbv	0.3	7450	6600	3630	5890
Chlorobenzene	ppbv	0.2	ND	ND	2500	833
m/p-Xylene (Dimethyl Benzene) ^c	ppbv	0.65	12100	11000	4500	9200
o-Xylene (Dimethyl Benzene) ^c	ppbv	0.3	4760	4020	2210	3660
Styrene (Vinylbenzene)	ppbv	0.1	1560	1490	750	1270
Tribromomethane (Bromoform)	ppbv	0.3	22	25	ND	16
1,1,1,2-Tetrachloroethane	ppbv	0.2	ND	ND	ND	ND
1-Ethyl-4-methylbenzene (4-Ethyl Toluene) ^b	ppbv	0.2	791	804	1090	894
1,3,5-Trimethylbenzene ^b	ppbv	0.2	791	804	1090	894
1,2,4-Trimethylbenzene ^c	ppbv	0.3	1750	1800	970	1510
1,4-Dichlorobenzene	ppbv	0.3	363	401	221	328
1,3-Dichlorobenzene	ppbv	0.2	341	356	185	294
Benzyl Chloride	ppbv	0.2	ND	ND	ND	ND
1,2-Dichlorobenzene	ppbv	0.3	ND	ND	ND	ND
1,1,1,2,3,4,4-Hexachloro-1,3-butadiene	ppbv	0.2	ND	ND	ND	ND
1,2,4-Trichlorobenzene	ppbv	0.3	ND	ND	ND	ND
Acrylonitrile	ppbv	20	ND	ND	ND	ND
Chlorodifluoromethane (Freon 22)	ppbv	20	ND	ND	ND	ND

ND - Constituent not detected at the stated detection limits

^a In computing averages, when all measurements are ND, the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50 percent of the stated MDL. If MDL is not reported, a ND measurement is treated as zero.

^b 1-Ethyl-4-methylbenzene (4-Ethyl Toluene) and 1,3,5-Trimethylbenzene co-eluted from the GC and also have the same quantitation ions, thus making them indistinguishable. Therefore, the reported values represent the combined concentrations of these two compounds.

^c Analyte detected in blank sampled 0.21 to 3.03 ppbv. See table 5-3 for analyte-specific detected levels.

4.1.2.2 *Non-methane Organic Compounds (NMOCs)*

Non-methane organic compounds (NMOCs) in the raw LFG were analyzed by Method 25C on the samples collected by Method 40. The NMOC concentrations in the raw LFG are presented in Table 4-2. The table also includes concentrations of methane (CH₄), CO₂, and O₂, which are results obtained as part of the NMOC analyses.

The other analytes, oxygen (O₂), carbon dioxide (CO₂), and moisture, are not pollutants but are of interest as they are useful indicators of the “quality” of the raw LFG. The concentrations of nitrogen (N₂) and O₂ are also indicators of the extent of ambient air infiltration into the LFG collection. Method 25C for NMOC determination specifically recommends that these measurements be made to determine potential air infiltration. Therefore, while measurements for methane (CH₄), CO₂, O₂, and N₂ by Method 3C were not included in the original QAPP, these measurements were included and performed.

There is good agreement between CH₄ and CO₂ values obtained from Method 25C and Method 3C.

Table 4-2. Raw Landfill Gas Non-Methane Organic Compound (NMOC) Concentrations

	NMOC (ppmv as Hexane)	CH ₄ (% v/v)		CO ₂ (% v/v)		O ₂ (%v/v)	N ₂ (% v/v)	Moisture (% v/v)
		Method 25C	Method 25C	Method 3C	Method 25C	Method 3C	Method 3C	Method 3C
Run 1	3650	57.7	49.1	47.2	36.9	1.4	13.5	NM
Run 2	4630	54.6	47.4	45.2	35.4	1.5	15.3	NM
Run 3	9330	55.7	47.5	46.2	35.5	1.9	18.9	NM
Average	5870	56.0	48.0	46.2	35.9	1.6	15.9	NM

Concentrations are reported without correction for nitrogen

NM – not measured because Method 23 sampling train was not run. Data column is included to retain format consistency with reports for Landfills A and B.

4.1.2.3 *Hydrogen Sulfide (H₂S)*

Raw LFG pipe H₂S concentrations were obtained by collecting and analyzing the samples in accordance with EPA Method 11. These results are presented in Table 4-3.

Table 4-3. Raw Landfill Gas Hydrogen Sulfide (H₂S) Concentrations

	H ₂ S Concentration	
	(mg/m ³)	(ppmv)
Run 1	98.0	69.4
Run 2	26.8	19.0
Run 3	110.0	78.0
Average	78.3	55.5

Sample hold times exceeded specified 30 days by 3 days

4.1.2.4 Carbonyls

The target carbonyl compounds, formaldehyde and acetaldehyde, were analyzed by SW-846 Method 8315 on samples collected by EPA Method 0100. The analysis results are presented in Table 4-4.

Table 4-4. Raw Landfill Gas Carbonyls Concentrations

	Formaldehyde		Acetaldehyde	
	(µg/m ³)	(x10 ⁻³ ppmv)	(µg/m ³)	(x10 ⁻³ ppmv)
MDL	8.0	6.4	8.3	4.5
Run 1	28.3	22.7	118	64.3
Run 2	26.9	21.5	114	62.4
Run 3	46.6	37.3	495	270
Average	33.9	27.2	242	132

4.1.2.5 Mercury (Hg)

Mercury (Hg) can exist in several forms. This test program focused on the elemental, monomethyl, and dimethyl forms of Hg, and total Hg. Elemental Hg was measured with the LUMEX instrument. Organic monomethyl Hg, dimethyl Hg, and total Hg were sampled and analyzed using the organic mercury method.

4.1.2.5.1 Total Mercury (Hg) Samples

To collect the total Hg samples, an iodated charcoal trap was used as a sorbent. A backup tube was also present to assess any breakthrough. The sorbent tube was heated

to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull a sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-5 presents the total Hg concentrations in the raw LFG. They ranged from 423 to 427 ng/m³ with an average of 425 ng/m³.

Table 4-5. Raw Landfill Gas Total Mercury Concentrations

	Total Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppm)
MDL	50	6.0
Run 1	425	51.2
Run 2	427	51.4
Run 3	423	50.9
Average	425	51.2

Sample hold time was 15 days, exceeding the 14-day specification

4.1.2.5.2 Dimethyl Mercury (Hg) Samples

To collect the dimethyl Hg sample, a Carbotrap was used as a sorbent. A backup tube was also present to assess any breakthrough. A third iodated carbon trap was also present to collect any elemental Hg present. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-6 presents the dimethyl Hg concentrations in the raw LFG. The analyzed concentrations ranged from 6.5 to 20.9 ng/m³ with an average of 14.8 ng/m³.

Table 4-6. Raw Landfill Gas Dimethyl Mercury Concentrations

	Dimethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.5	0.05
Run 1	20.9	2.2
Run 2	6.5	0.7
Run 3	17.1	1.8
Average	14.8	1.5

4.1.2.5.3 Monomethyl Mercury (Hg) Samples

To collect the sample, a set of three impingers filled with 0.001 M HCl was used to collect the monomethyl Hg. An empty fourth impinger was used to knockout any impinger solution carryover to the pump and meter system. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

As shown in Table 4-7, monomethyl Hg concentrations in the raw LFG ranged from 3.1 to 5.4 ng/m³.

Table 4-7. Raw Landfill Gas Monomethyl Mercury Concentrations

	Monomethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.13	0.014
Run 1	5.4	0.60
Run 2	3.1	0.35
Run 3	3.3	0.37
Average	3.9	0.44

Sample hold time was 15 days, exceeding the 14-day specification

4.1.2.5.4 Elemental Mercury (Hg)

Elemental Hg was determined by the LUMEX instrument and the results are presented in Table 4-8. The analyzed concentrations ranged from 90 to 103 ng/m³.

4.2 Engine Stack Results

The engine stack was sampled for NMOCs (as THC_s), PCDD/PCDF_s, PAH_s, HCl, Pb, As, Cd, Cr, Mn, Ni, total Hg, SO₂, NO_x, CO, CO₂, and O₂. The stack cross section was divided into 12 equal areas according to EPA Method 1A. Sampling run time for metals was 60 minutes. Run time for HCl varied between 40 and 50 minutes. Run time for PCDD/PCDF_s sampling was 180 minutes. Run time for CEMS parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) varied.

Table 4-8. Raw Landfill Gas Elemental Mercury Concentrations

	Concentration ^a			
	Background		Raw Landfill Gas	
	(ng/m ³)	(x10 ⁻⁶ ppmv)	(ng/m ³)	(x10 ⁻⁶ ppmv)
Run 1	NM	NM	101	12.2
Run 2	2	0.2	103	12.4
Run 3	20	2.4	103	12.4
Run 4	3	0.4	90	10.8
Average	8	1.0	99	11.9

NM – Not measured

^a Average of three repetitions

4.2.1 Engine Stack Gas Flow Rate and Temperature

Sampling at the engine stack was conducted at isokinetic conditions with the exception of EPA Method 26 (HCl), which was conducted at proportional extraction rates. The procedures provided stack gas velocity distribution across the engine stack and reliable measurements of stack gas flow rates. Table 4-9 lists the volumetric flow rates and temperatures at the engine stack measured during the various sampling runs.

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Table 4-9. Engine Stack Gas Operating Conditions Measured during Sampling

Run Number	Date	Time	Average Stack Temp (°F)	Carbon Dioxide (%)	Oxygen (%)	Moisture (%)	Velocity (actual ft/sec)	Volumetric Flow Rate (acfm)	Volumetric Flow Rate (dscfm)
C-Post-M29-051404-01	05/14/04	09:25 – 10:35	1015	16.5	2.3	17.5	195	6390	1920
C-Post-M29-051404-02	05/14/04	11:07 – 12:27	1028	16.5	2.3	17.5	200	6530	1950
C-Post-M29-051404-03	05/14/04	12:29 – 13:39	1038	16.5	2.3	18.0	195	6390	1890
C-Post-M23-051304-01	05/13/04	12:09 – 15:19	1005	15.6	3.2	16.2	200	6550	2000
C-Post-M23-051304-02	05/13/04	15:54 – 19:15	1009	16.1	3.0	16.7	191	6260	1920
C-Post-M23-051404-03	05/14/04	15:27 – 18:52	997	16.4	2.9	16.2	200	6460	2000
Average			1016	16.3	2.7	17.0	197	6430	1950

Engine stack cross-section flow area is 0.55 sq. ft.

4.2.2 Engine Stack Gas Constituents

The concentrations of the constituents of interest in the engine stack are presented in the following Subsections 4.2.2.1 through 4.2.2.7.

4.2.2.1 Engine Stack Oxygen (O₂) and Carbon Dioxide (CO₂)

Oxygen (O₂) and CO₂ concentrations provide an overall indication of the combustion process. Figure 4-1 shows the O₂ and CO₂ concentrations measured by the CEMs during the two days of testing. The plotted data excluded the CEM responses during instrument zeroing and calibration periods. Table 4-10 presents the daily averages of O₂ and CO₂ concentrations.

Table 4-10. Engine Stack Combustion Product Concentrations

	O ₂ (% v)	CO ₂ (% v)
Run 1	2.3	16.5
Run 2	2.3	16.5
Run 3	2.3	16.5
Run 4	3.2	15.6
Run 5	3.0	16.1
Run 6	2.9	16.4
Average	2.7	16.3

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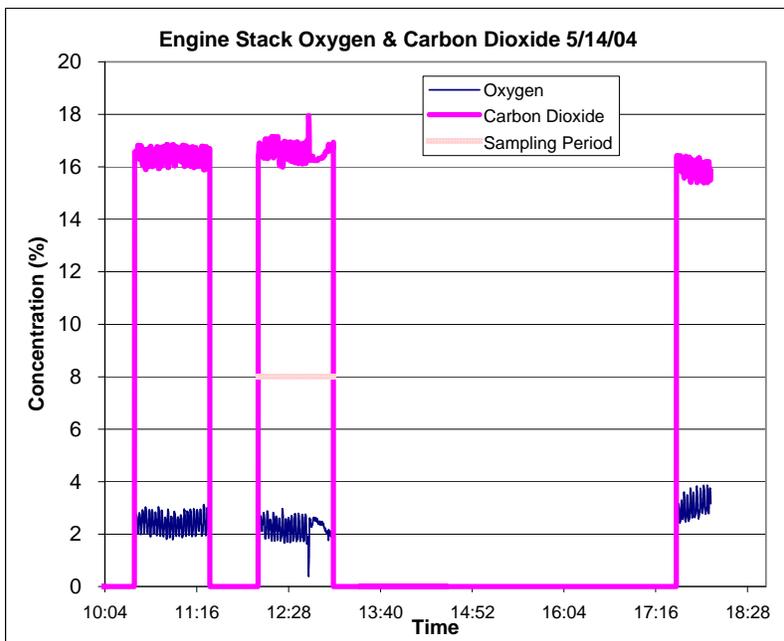
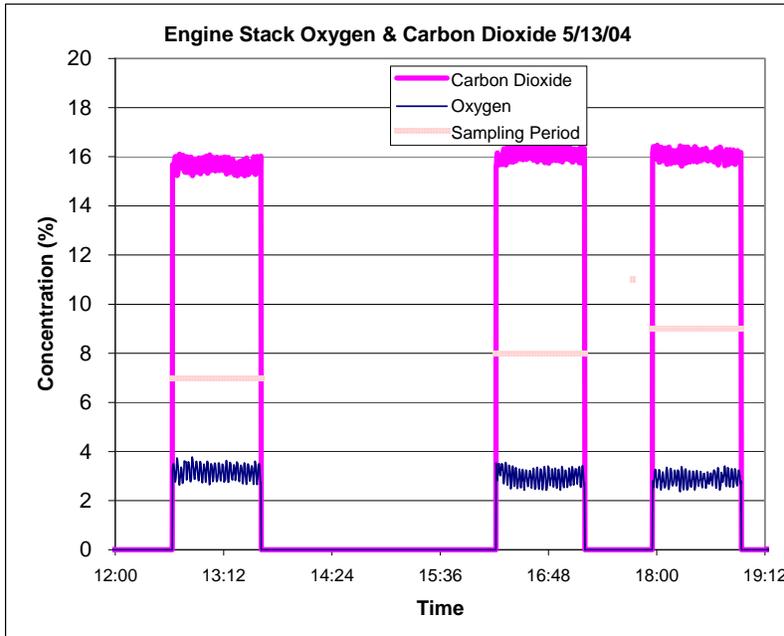


Figure 4-1. Engine Stack Oxygen and Carbon Dioxide Concentrations

4.2.2.2 Engine Stack Total Hydrocarbon (THC) Concentrations

Engine stack THC emissions were measured by EPA Method 25A, which used a CEMs. EPA Method 25A produces concentrations of all hydrocarbons that respond to flame ionization detector (FID) analysis; these hydrocarbons are regarded as the NMOCs reported as propane. Real-time continuous instrument responses are shown in Figure 4-2. The time-averaged concentrations are presented in Table 4-11. The instantaneous concentrations of total hydrocarbons ranged from 300 to 450 ppmv as hexane.

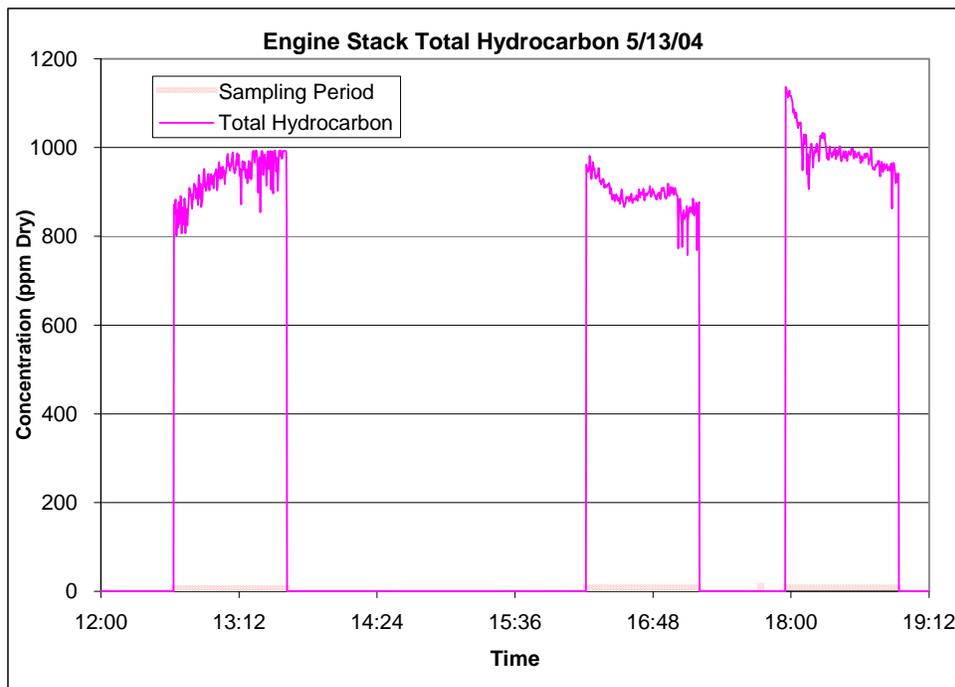


Figure 4-2. Engine Stack Total Hydrocarbon Concentrations

Table 4-11. Engine Stack THC Concentrations

	THC (ppmdv as propane)	THC (ppmdv as hexane)
Run 1	934	467
Run 2	893	447
Run 3	994	497
Average	940	470

4.2.2.3 Engine Stack Dioxin/Furan (PCDD/PCDFs) Concentrations

Table 4-12 presents the engine stack PCDD/PCDFs emissions data. In all but one case (12346789-OCDD on Run 1) results were below the detection limits of the analytical method. The detection limits for the individual congeners varied from 0.96 to 12.7 picograms per sample. Table 4-13 presents the same data, but expressed in terms of Toxicity Equivalent (TEQ) emissions. The TEQs are expressed as if the detection limits were the actual laboratory results, i.e., the worst case.

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Table 4-12. Engine Stack Dioxins and Furans Emissions

Analyte	C-M23-51304-01			C-M23-51304-02			C-M23-51404-03			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
Dioxins												
2,3,7,8-TCDD	<0.67	<2.3	<5.0	<0.56	<1.8	<4.0	<0.46	<1.6	<3.4	ND	ND	ND
Other TCDD	4.2	14.3	31.4	12.4	40.3	89.0	8.1	27.3	60.3	8.2	27.3	60.2
1,2,3,7,8-PeCDD	<0.39	<1.3	<3.0	<0.56	<1.8	<4.0	<0.94	<3.2	<7.1	ND	ND	ND
Other PeCDD	0	0	0	10.2	33.3	73.5	0	0	0	3.4	11.1	24.5
1,2,3,4,7,8-HxCDD	<1.2	<4.0	<8.9	<1.5	<4.9	<10.9	<0.95	<3.2	<7.1	ND	ND	ND
1,2,3,6,7,8-HxCDD	<1.2	<4.1	<9.0	<1.6	<5.2	<11.4	<0.99	<3.3	<7.4	ND	ND	ND
1,2,3,7,8,9-HxCDD	<1.4	<4.7	<10.3	<1.8	<6.0	<13.2	<1.1	<3.8	<8.4	ND	ND	ND
Other HxCDD	0	0	0	3.6	11.7	25.8	0	0	0	1.2	3.9	8.6
1,2,3,4,6,7,8-HpCDD	<2.5	<8.5	<18.7	<1.2	<4.0	<8.9	<1.2	<3.9	<8.6	ND	ND	ND
Other HpCDD	0	0	0	0	0	0	0	0	0	0	0	0
1,2,3,4,6,7,8,9-OCDD	7.6	25.9	57.1	<2.7	<8.9	<19.6	<4.0	<13.5	<29.9	3.7	10.1	22.3
Total CDD	<19.1	<65.1	<144	<36.2	<118	<260	<17.7	<59.9	<132	ND	ND	ND
Furans												
2,3,7,8-TCDF	<0.58	<2.0	<4.3	<0.83	<2.7	<6.0	<1.0	<3.5	<7.8	ND	ND	ND
Other TCDF	0	0	0	2.3	7.4	16.3	0	0	0	0.75	2.5	5.4
1,2,3,7,8-PeCDF	<1.0	<3.5	<7.7	<0.74	<2.4	<5.3	<0.76	<2.6	<5.7	ND	ND	ND
2,3,4,7,8-PeCDF	<0.94	<3.2	<7.0	<0.70	<2.3	<5.0	<0.68	<2.3	<5.1	ND	ND	ND
Other PeCDF	0	0	0	0	0	0	0	0	0	0	0	0
1,2,3,4,7,8-HxCDF	<0.24	<0.81	<1.8	<0.44	<1.4	<3.1	<0.44	<1.5	<3.3	ND	ND	ND
1,2,3,6,7,8-HxCDF	<0.23	<0.78	<1.7	<0.40	<1.3	<2.9	<0.42	<1.4	<3.2	ND	ND	ND
2,3,4,6,7,8-HxCDF	<0.26	<0.88	<1.9	<0.45	<1.5	<3.2	<0.47	<1.6	<3.5	ND	ND	ND
1,2,3,7,8,9-HxCDF	<0.40	<1.4	<3.0	<0.69	<2.3	<5.0	<0.72	<2.4	<5.4	ND	ND	ND

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Analyte	C-M23-51304-01			C-M23-51304-02			C-M23-51404-03			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
Other HxCDF	0	0	0	0	0	0	0	0	0	0	0	0
1,2,3,4,6,7,8-HpCDF	<0.37	<1.3	<2.8	<1.2	<4.1	<9.0	<0.52	<1.8	<3.9	ND	ND	ND
1,2,3,4,7,8,9-HpCDF	<0.64	<2.2	<4.8	<0.66	<2.2	<4.8	<0.84	<2.9	<6.3	ND	ND	ND
Other HpCDF	0	0	0	0	0	0	0	0	0	0	0	0
1,2,3,4,6,7,8,9-OCDF	<2.6	<9.0	<19.8	<3.0	<9.9	<21.9	<3.0	<10.2	<22.4	ND	ND	ND
Total CDF	<7.3	<24.9	<55.0	<9.2	<37.4	<82.4	<8.9	<30.2	<66.5	ND	ND	ND
Total CDD/CDF	<26.4	<90.0	<198	<45.4	<155	<343	<26.6	<90.1	<199	ND	ND	ND

In computing averages, when all measurements are ND, the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50 percent of the stated MDL. If MDL is not reported, a ND measurement is treated as zero.

“<” denotes the measurement was non-detect. The value following the “<” sign is the detection limit.

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Table 4-13. Engine Stack Dioxins and Furans Toxicity Equivalent Emissions

Pollutant	Three-Run Average			1989 Toxicity Equivalency Factor	Toxicity Equivalent Emissions		
	Concentration	Emission Rate			Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
<u>Dioxins</u>							
2,3,7,8-TCDD	<0.56	<1.9	<4.2	1	<0.56	<1.9	<4.2
Other TCDD	8.2	27.3	60.2	---	NA	NA	NA
1,2,3,7,8-PeCDD	<0.63	<2.1	<4.7	0.5	<0.32	<1.1	<2.3
Other PeCDD	3.4	11.1	24.5	---	NA	NA	NA
1,2,3,4,7,8-HxCDD	<1.2	<4.1	<9.0	0.1	<0.12	<0.41	<0.90
1,2,3,6,7,8-HxCDD	<1.3	<4.2	<9.3	0.1	<0.13	<0.42	<0.93
1,2,3,7,8,9-HxCDD	<1.4	<4.8	<10.6	0.1	<0.14	<0.48	<1.1
Other HxCDD	1.2	3.9	8.6	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDD	<1.6	<5.5	<12.1	0.01	<0.016	<0.055	<0.121
Other HpCDD	0	0	0	---	NA	NA	
1,2,3,4,6,7,8,9-OCDD	3.7	10.1	22.3	0.001	0.0037	0.0101	0.0223
Total CDD	24.3	81.0	178.6	---	NA	NA	NA
<u>Furans</u>							
2,3,7,8-TCDF	<0.82	<2.7	<6.0	0.1	<0.082	<0.27	<0.60
Other TCDF	0.75	2.5	5.4	---	NA	NA	
1,2,3,7,8-PeCDF	<0.84	<2.8	<6.2	0.05	<0.042	<0.14	<0.31
2,3,4,7,8-PeCDF	<0.77	<2.6	<5.7	0.5	<0.39	<1.3	<2.9

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Pollutant	Three-Run Average			1989 Toxicity Equivalency Factor	Toxicity Equivalent Emissions		
	Concentration	Emission Rate			Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
Other PeCDF	0	0	0	---	NA	NA	NA
1,2,3,4,7,8-HxCDF	<0.37	<1.2	<2.7	0.1	<0.037	<0.12	<0.27
1,2,3,6,7,8-HxCDF	<0.35	<1.2	<2.6	0.1	<0.035	<0.12	<0.26
2,3,4,6,7,8-HxCDF	<0.39	<1.3	<2.9	0.1	<0.039	<0.13	<0.29
1,2,3,7,8,9-HxCDF	<0.61	<2.0	<4.5	0.1	<0.061	<0.20	<0.45
Other HxCDF	0	0	0	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDF	<0.71	<2.4	<5.2	0.01	<0.0071	<0.024	<0.052
1,2,3,4,7,8,9-HpCDF	<0.72	<2.4	<5.3	0.01	<0.0072	<0.024	<0.053
Other HpCDF	0	0	0	---	NA	NA	
1,2,3,4,6,7,8,9-OCDF	<2.9	<9.7	<21.4	0.001	<0.0029	<0.0097	<0.0214
Total CDF	<8.5	<30.8	<68.0	---	NA	NA	NA
Total CDD/CDF	<32.8	<112	<247	---	NA	NA	NA

NA – not applicable because no Toxicity Equivalency Factor is available.

"<" denotes the measurement was non-detect. The value following the "<" sign is the detection limit.

4.2.2.4 Engine Stack Polycyclic Aromatic Hydrocarbons (PAHs) Concentrations

The concentrations of PAHs were obtained by CARB Method 429 analysis (comparable to EPA Method 23). The results are presented in Table 4-14.

4.2.2.5 Hydrogen Chloride (HCl) Concentrations

Engine stack HCl emissions results are presented in Table 4-15. Since EPA Method 26 (non-isokinetic procedure) was used, stack gas flows from the EPA Method 23 run performed on the same day as the M26 runs (May 14) were used in the mass emissions calculations.

4.2.2.6 Metals Concentrations

Engine stack metals emissions results are presented in Table 4-16. The metal concentrations were determined by Method 29, and included those for As, Cd, Cr, Pb, Mn, Hg (total), and Ni. Mercury (Hg) concentration (elemental) was separately measured by the LUMEX instrument and those results are also included in Table 4-16.

The “<” symbol denotes that the notated metal was not detected in that sample. The values following the “<” symbol represent the concentrations and emission rates that would have been the case had the metal been found at the method detection limit. Hence the values represent the upper limits of what might be present.

4.2.2.7 Gaseous Concentrations: Carbon Monoxide (CO), Sulfur Dioxide (SO₂), and Nitrogen Oxides (NO_x)

Gaseous emissions measured with CEMs include CO, SO₂ and NO_x. These results are summarized in Table 4-17. The detailed CEM measurement plots are shown in Figures 4-3 through 4-5. Carbon monoxide concentrations averaged 568 ppm_{dv}. Sulfur dioxide was not detected. Nitrogen oxides ranged from 2280 to 3150 ppm_{dv}, averaging at 2730 ppm_{dv}.

4.3 Comparison with AP-42 Values

One of the major objectives of the test program is to expand on the database of LFG constituent compounds and their concentrations. If warranted, these data may contribute towards updating the AP-42 default values.

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Table 4-14. Engine Stack Polycyclic Aromatic Hydrocarbons Emissions

Analyte	Formula Weight	M23-I-C				M23-II-C				M23-III-C				Average			
		Concentration		Emission Rate		Concentration		Emission Rate		Concentration		Emission Rate		Concentration		Emission Rate	
		(x10 ⁻⁶ ppmv)	(ng/dscm)	(x10 ⁻⁶ g/hr)	(x10 ⁻⁶ lb/hr)	(x10 ⁻⁶ ppmv)	(ng/dscm)	(x10 ⁻⁶ g/hr)	(x10 ⁻⁶ lb/hr)	(x10 ⁻⁶ ppmv)	(ng/dscm)	(x10 ⁻⁶ g/hr)	(x10 ⁻⁶ lb/hr)	(x10 ⁻⁶ ppmv)	(ng/dscm)	(x10 ⁻⁶ g/hr)	(x10 ⁻⁶ lb/hr)
Acenaphthene ^a	154.21	101	649	2500	5.4	84.5	542	2000	4.4	74.1	475	1800	4.0	86.6	555	2100	4.6
Acenaphthylene ^a	152.20	270	1700	6500	14.2	252	1600	5800	12.8	195	1230	4700	10.4	239	1510	5700	12.5
Anthracene ^a	178.23	56.8	421	1600	3.5	51.2	380	1400	3.1	42.8	317	1200	2.7	50.3	372	1400	3.1
Benzo(a)anthracene ^a	228.30	7.7	73.2	278	0.612	6.5	61.4	224	0.495	5.5	52.0	199	0.438	6.6	62.2	233.5	0.515
Benzo(a)pyrene ^a	252.32	0.292	3.1	11.6	0.0256	0.343	3.6	13.1	0.0290	0.248	2.6	9.9	0.0219	0.294	3.1	11.6	0.0255
Benzo(b)fluoranthene ^a	252.32	5.6	59	224	0.495	3.8	40	146	0.322	3.5	36.9	141	0.310	4.3	45.3	170.3	0.376
Benzo(g,h,i)perylene ^a	276.34	0.503	5.8	21.9	0.0483	0.680	7.8	28.5	0.0629	0.416	4.8	18.2	0.0402	0.533	6.1	22.9	0.0505
Benzo(k)fluoranthene ^a	252.32	1.4	15	56.5	0.125	0.952	10.0	36.5	0.0804	0.703	7.4	28.2	0.0621	1.0	10.8	40.4	0.0890
Chrysene ^a	228.29	21.4	203	770	1.7	16.6	158	577	1.3	14.2	135	513	1.1	17.4	165	620.1	1.4
Dibenzo(a,h)anthracene ^a	278.35	0.314	3.6	13.8	0.0304	0.233	2.7	9.9	0.0217	0.202	2.3	8.9	0.0197	0.250	2.9	10.9	0.0239
Fluoranthene ^a	202.26	51.5	433	1600	3.6	45.1	380	1400	3.1	32.1	270	1000	2.3	42.9	361	1400	3.0
Fluorene ^a	166.22	127	878	3300	7.3	97.1	671	2500	5.4	82.8	572	2200	4.8	102	707	2700	5.9
Indeno(1,2,3-cd)pyrene ^a	288.35	0.924	11.1	42.0	0.0926	0.627	7.5	27.5	0.0605	0.538	6.5	24.6	0.0543	0.697	8.3	31.4	0.0691
Naphthalene ^a	128.17	7800	41400	157000	346	8700	46200	169000	372	7800	41400	158000	348	8100	43000	161100	355
Phenanthrene ^a	178.23	446	3300	12500	27.6	337	2500	9100	20.1	300	2220	8500	18.7	361	2670	10000	22.1
Pyrene ^a	202.26	41.3	347	1300	2.9	32.9	277.0	1000	2.2	28.7	241	920	2.0	34.3	290	1100	2.4
2-Methylnaphthalene ^a	142.20	1400	8200	31000	68.3	1100	6300	23200	51.1	948	5600	21400	47.1	1100	6700	25200	55.5
Benzo(e)Pyrene ^a	252.32	4.0	42.3	160	0.354	2.5	26.2	95.8	0.211	2.3	23.9	91.1	0.200	2.9	30.8	115.8	0.255
Perylene ^b	253.31	<0.0907	951000	3.6	0.0079	<0.0952	998000	3.6	0.0080	<0.0902	0.9	3.6	0.0080	<0.0920	1.0	3.6	0.0080

^a These analytes were detected in field blank sample. See Table 5-2 for detected concentrations

^b Recovery of d₁₂ perylene was below acceptable range

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Table 4-15. Engine Stack Hydrogen Chloride (HCl) Emissions

	HCl Concentration		HCl Emission Rate	
	(ppmdv)	(mg/m ³)	(lb/hr)	(g/hr)
Run 1	9.1	13.8	0.103	46.6
Run 2	12.5	19.7	0.142	64.4
Run 3	14.3	20.6	0.163	73.7
Average	12.0	18.0	0.136	61.6

Table 4-16. Engine Stack Metals Emissions

Analyte	C-POST-M29-051404-01			C-POST-M29-051404-02			C-POST-M29-051404-03			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)
Arsenic	2.7	8.9	19.6	4.1	14	30.1	2.6	8.2	18.2	3.1	10	22.6
Cadmium	0.75	2.5	5.4	0.556	1.8	4.1	0.416	1.3	2.9	0.574	1.9	4.1
Chromium	5.2	17	37.6	4.3	14	31.6	3.6	12	25.6	4.4	14	31.6
Lead	0.73	2.4	5.3	0.40	1.3	2.9	<0.83	<2.7	<5.9	0.52	1.7	3.7
Manganese	3.7	12	26.5	3.6	12	26.4	8.9	28	62.5	5.4	17	38.5
Nickel ^a	30.6	100	220.3	12.9	43	94.4	8.9	29	63.0	18	57	126
Mercury (Total by Method 29)	<2.9	<10	<21.2	<2.9	<10	<21.1	<3.1	<10	<22	ND	ND	ND
	RUN 1			RUN 2			RUN 3			Average		
Mercury (Elemental by LUMEX)	0.147	0.457	1.0078	0.230	0.722	1.59	0.124	0.379	0.836	0.167	0.519	1.15

^a Two of four calibration verification samples were at 10.6 and 14.0 percent and were above the acceptable range of ±10 percent

Table 4-17. Engine Stack CO, SO₂, NO_x Concentrations

	Concentration (ppmdv)		
	CO	SO ₂	NO _x (as NO)
Run 1	562	0	2770
Run 2	556	0	3150
Run 3	585	0	2280
Average	568	0	2730

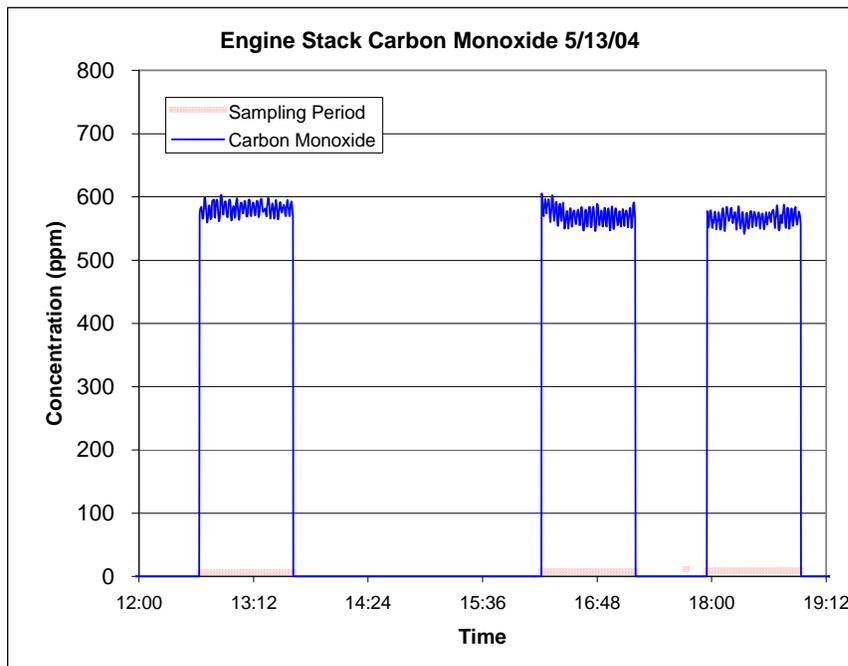


Figure 4-3. Engine Stack Carbon Monoxide Concentrations

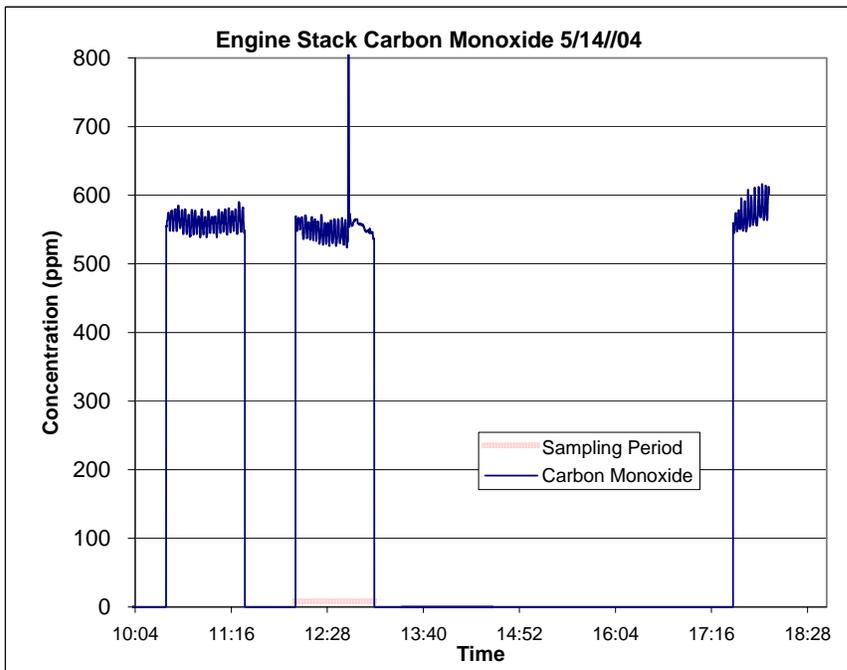
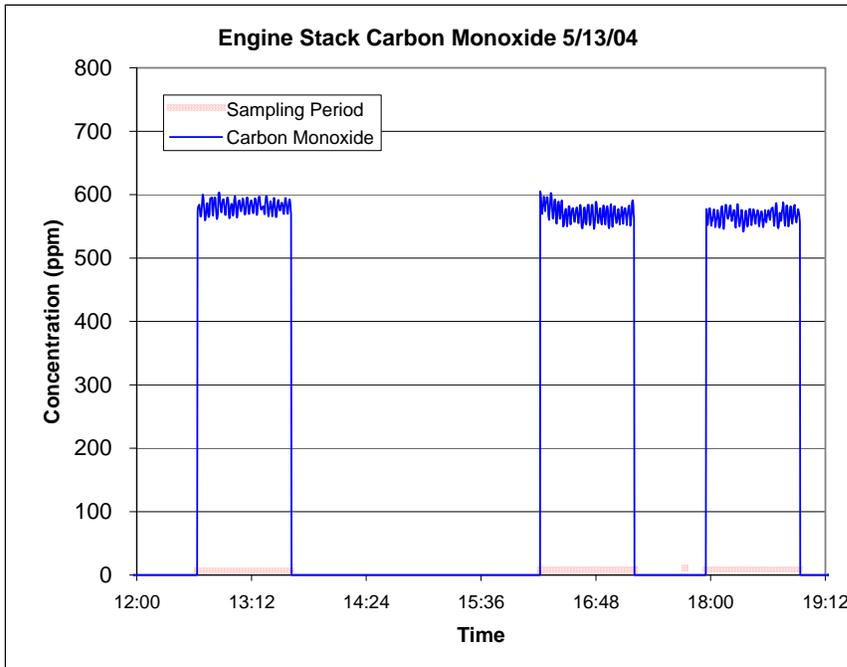


Figure 4-4. Engine Stack Sulfur Dioxide Concentrations

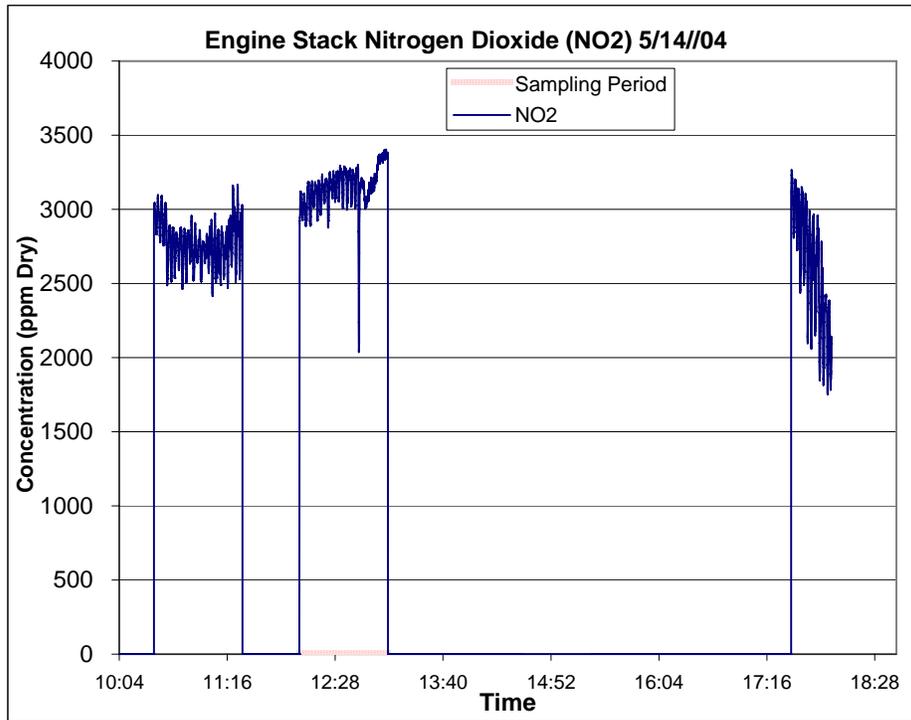


Figure 4-5. Engine Stack Nitric Oxide Concentrations

Table 4-18 presents the concentrations of LFG constituents to provide direct comparisons with AP-42 default values. Table 4-19 presents the concentration of other constituents targeted by the various analyses but are not listed in AP-42. An expanded discussion and comparison is included in the overall project report.

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Table 4-18. Comparison of Raw Landfill Gas Constituent Concentrations with AP-42 Values

Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1,1,1-Trichloroethane	71-55-6	133.42	0.48	0.0003	ND	ND	ND	ND	ND
M-40	1,1,2,2-Tetrachloroethane	79-34-5	167.85	1.11	0.0002	ND	ND	ND	ND	ND
M-40	1,1-Dichloroethane (Ethylidene Dichloride)	75-34-3	98.96	2.35	0.0004	0.423	108	1730	2060	4.5
M-40	1,1-Dichloroethene	75-35-4	96.94	0.20	0.0002	0.055	13.9	222	264	0.582
M-40	1,2-Dichloroethane	107-06-2	98.96	0.41	0.0003	0.037	9.5	152	181	0.399
M-40	1,2-Dichloropropane	78-87-5	112.98	0.18	0.0003	ND	ND	ND	ND	ND
M-40	Isopropyl alcohol (2-Propanol)	67-63-0	60.11	50.10	0.0002	1.28	199	3190	3790	8.4
M-40	Acetone	67-64-1	58.08	7.01	0.0003	11.7	1800	28200	33500	73.8
M-40	Acrylonitrile	107-13-1	53.06	6.33	0.02	ND	ND	ND	ND	ND
M-40	Bromodichloromethane	75-27-4	163.83	3.13	0.0002	ND	ND	ND	ND	ND
M-40	Butane	106-97-8	58.12	5.03		37.9	5700	91200	108000	239
M-40	Carbon Disulfide	75-15-0	76.13	0.58	0.0003	0.157	30.8	494	587	1.3
No Test	Carbon Monoxide	630-08-0	28.01	141		NM	NM	NM	NM	NM
M-40	Carbon Tetrachloride	56-23-5	153.84	0.004	0.0005	ND	ND	ND	ND	ND
No Test	Carbonyl Sulfide (Carbon oxysulfide)	463-58-1	60.07	0.49		NM	NM	NM	NM	NM
M-40	Chlorobenzene	108-90-7	112.56	0.25	0.0002	0.833	242	3880	4620	10.2
M-40	Chlorodifluoromethane (Freon 22)	75-45-6	86.47	1.30	0.02	ND	ND	ND	ND	ND
M-40	Chloroethane (Ethyl Chloride)	75-00-3	64.52	1.25	0.0002	30.4	5100	81200	966000	213
M-40	Chloroform	67-66-3	119.39	0.03	0.0003	0.744	230	3680	4370	9.6
M-40	Chloromethane	74-87-3	50.49	1.21	0.0001	1.26	165	2640	3140	6.9
M-40	1,4-Dichlorobenzene	106-46-7	147.00	0.21	0.0003	0.328	125	2000	2380	5.2
M-40	1,3-Dichlorobenzene	541-73-1	147.00	0.21	0.0002	0.394	150	2400	2850	6.3

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1,2-Dichlorobenzene	95-50-1	147.01	0.21	0.0003	ND	ND	ND	ND	ND
M-40	Dichlorodifluoromethane (Freon 21)	75-71-8	120.91	15.70	0.0003	1.61	501	8020	9540	21.0
M-40	Dichlorofluoromethane (Freon 12)	75-43-4	102.92	2.62	0.0003	ND	ND	ND	ND	ND
M-40	Methylene Chloride (Dichloromethane)	75-09-2	84.94	14.30	0.0001	5.35	1200	18800	22400	49.3
No Test	Dimethyl Sulfide (Methyl sulfide)	75-18-3	62.13	7.82		NM	NM	NM	NM	NM
M-40	Ethane	74-84-0	30.07	889	1	14.3	1100	17800	21200	46.8
M-40	Ethanol	64-17-5	46.08	27.20	0.0002	0.172	20.4	328	390	0.859
No Test	Ethyl Mercaptan (Ethanediol)	75-08-1	62.13	2.28		NM	NM	NM	NM	NM
M-40	Ethylbenzene	100-41-4	106.16	4.61	0.0003	5.89	1600	25900	30800	67.9
M-40	1,2-Dibromoethane (Ethylene dibromide)	106-93-4	187.88	0.001	0.0002	0.021	10.1	161	192	0.422
M-40	Trichloromonofluoromethane (Fluorotrichloromethane) (F11)	75-69-4	137.38	0.76	0.0002	0.504	179	2870	3410	7.5
M-40	Hexane	110-54-3	86.18	6.57	0.0003	28.4	6300	101000	120000	265
M-11	Hydrogen Sulfide	7783-06-4	34.08	35.50		55.5	4900	78300	93100	205
Organic mercury	Mercury (Dimethyl)		230.66	Not Listed	0.05E-06	1.6E-06	0.000934	0.015	0.01780	0.0000392
LUMEX	Mercury (Elemental)	7439-97-6	200.61	Not Listed		11.8E-06	0.0061	0.098	0.117	0.000257
Organic mercury	Mercury (Monomethyl)		215.62	Not Listed	0.014E-06	0.44E-06	0.000245	0.00393	0.00467	0.0000103
Organic mercury	Mercury (Total)		215.63	253.0E-6	6E-06	51.2E-06	0.0285	0.46	0.54	0.00120
M-40	2-Butanone (Methyl Ethyl Ketone)	78-93-3	72.10	7.09	0.0003	4.57	851	13600	16200	35.7

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	2-Hexanone (Methyl Butyl Ketone)	591-78-6	100.16	1.87	0.0002	ND	ND	ND	ND	ND
No Test	Methyl Mercaptan (Methanethiol)	74-93-1	48.11	2.49		NM	NM	NM	NM	NM
M-40	Pentane	109-66-0	72.15	3.29	1	26.6	5000	79400	94400	208
M-40	Tetrachloroethylene (Perchloroethylene)	127-18-4	165.83	3.73	0.0003	1.69	726	11600	13800	30.5
M-40	Propane	74-98-6	44.09	11.10		40.0	4600	73000	86800	191
M-40	t-1,2-Dichloroethene	156-60-5	96.94	2.84	0.0003	0.042	10.4	167	199	0.439
M-40	Trichloroethylene (Trichloroethene)	79-01-6	131.38	2.82	0.0002	0.515	175	2800	3330	7.4
M-40	Vinyl Chloride	75-01-4	62.50	7.34	0.0002	0.768	124	1990	2360	5.2
M-40	m/p-Xylene (Dimethyl Benzene)	1330-20-7	106.16	12.10	0.00065	9.21	2500	40500	48100	106
M-40	o-Xylene (Dimethyl Benzene)	95-47-6	106.16	12.10	0.0003	3.66	1000	16100	19200	42.2
M-40	Benzene (Co-disposal)	71-43-2	78.11	11.10	0.0002	1.63	328	5260	6260	13.8
M-41	Benzene (No-disposal or Unknown)	71-43-2	78.11	1.91	0.0002	1.63	328	5260	6260	13.8
M-25C	NMOC as Hexane (Co-disposal)		86.17	2420.00		587	1300000	20900000	24900000	54900
M-25C	NMOC as Hexane (No-codisposal or Unknown)			595.00		587	1300000	20900000	24900000	54900
M-40	Toluene (Methyl Benzen) (Co-disposal)	108-88-3	92.13	165.00	0.0003	23.3	5600	89000	106000	233
M-40	Toluene (Methyl Benzene) (No or Unknown)	108-88-3	92.13	39.30	0.0003	23.3	5600	89000	106000	233

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Table 4-19. Raw Landfill Gas Constituent Concentrations for Compounds without AP-42 Values

Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-0100	Acetaldehyde	75-07-0	44.05	0.0045	0.133	15.1	242	288	0.635
M-0100	Formaldehyde	50-00-0	30.03	0.0064	0.027	2.1	34	40.4	0.0891
M-23	Dioxins/Furans				NM	NM	NM	NM	NM
M-23	PAHs				NM	NM	NM	NM	NM
M-25C	Carbon Dioxide	124-38-9	44.01		462000	52600000	842000000	1000000000	2200
M-25C	Methane	74-82-8	16.04		560000	23200000	372000000	442000000	975000
M-25C	Oxygen	7782-44-7	32.00		16000	1300000	21200000	25200000	55600
M-40	1,1,2,3,4,4-Hexachloro-1,3-butadiene	87-68-3	260.76	0.0002	ND	ND	ND	ND	ND
M-40	1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	76-13-1	187.38	0.0002	0.039	19.1	305	363	0.800
M-40	1,1,2-Trichloroethane	79-00-5	133.42	0.0002	0.445	154	2460	2920	6.4
M-40	1,2,4-Trichlorobenzene	120-82-1	181.46	0.0003	ND	ND	ND	ND	ND
M-40	1,2,4-Trimethylbenzene	95-63-6	120.19	0.0003	1.51	469	7510	8930	19.7
M-40	1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	76-14-2	170.92	0.0002	0.127	56.1	899	1070	2.4
M-40	1,3,5-Trimethylbenzene	108-67-8	120.19	0.0002	0.894	278	4450	5290	11.7
M-40	1,3-Butadiene (Vinylethylene)	106-99-0	54.09	0.0003	0.642	89.7	1440	1710	3.8
M-40	1,4-Dioxane (1,4-Diethylene Dioxide)	123-91-1	88.10	0.0002	0.007	1.5	24.3	28.9	0.0638
M-40	1-Ethyl-4-methylbenzene (4-Ethyl Toluene)	622-96-8	120.20	0.0002	0.894	278	4450	5290	11.7
M-40	4-Methyl-2-pentanone (MIBK)	108-10-1	100.16	0.0002	2.17	562	9000	10700	23.6

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Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	Benzyl Chloride (Chloromethyl Benzene)	100-44-7	126.58	0.0002	ND	ND	ND	ND	ND
M-40	Bromomethane (Methyl bromide)	74-83-9	94.95	0.0002	0.023	5.7	92	109	0.241
M-40	cis-1,2-Dichloroethene	156-59-2	96.94	0.0003	1.64	411	6580	7820	17.2
M-40	cis-1,3-Dichloropropene	10061-01-5	110.98	0.0002	ND	ND	ND	ND	ND
M-40	Cyclohexane	110-82-7	84.16	0.0003	3.30	718	11500	13700	30.2
M-40	Dibromochloromethane	124-48-1	208.29	0.0002	0.009	4.7	74.8	88.9	0.196
M-40	Ethyl Acetate	141-78-6	88.10	0.0003	1.42	323	5180	6160	13.6
M-40	Heptane	142-82-5	100.20	0.0002	2.86	740	11800	14100	31.1
M-40	Methyl-t-butyl Ether (MTBE)	1634-04-4	88.15	0.0003	0.257	58.5	937	1110	2.5
M-40	Styrene (Vinylbenzene)	100-42-5	104.14	0.0001	1.27	340	5450	6490	14.3
M-40	1,3-Dichloropropene	1006-02-6	110.98	0.0002	0.033	9.4	150	179	0.394
M-40	Tetrahydrofuran (Diethylene Oxide)	109-99-9	72.10	0.0004	1.17	218	3500	4160	9.2
M-40	Tribromomethane (Bromoform)	75-25-2	252.77	0.0003	0.016	10.3	164	195	0.431
M-40	Vinyl Acetate	108-05-4	86.09	0.0005	0.024	5.3	84	100	0.221

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5. Quality Assurance/Quality Control (QA/QC)

This project produced data that qualified to receive the “A” rating with respect to the rating system described in section 4.4.2 of the *Procedures for preparing Emission Factor Documents* (EPA-454/R-95-015). The cited EPA document provides a clear description of the requirements for an “A” data quality rating. Tests were performed by using an EPA reference test method, or when not applicable, a sound methodology. Tests were reported in enough detail for adequate validation and raw data were provided that could be used to duplicate the emission results presented in this report.

Throughout the results sections of this report, notations and footnotes were included to flag data that, for various reasons, did not meet their associated measurement quality objectives.

5.1 Assessment of Measurement Quality Objectives

Measurement quality objectives (MQOs) were established for each critical measurement and documented in the *Site-Specific QAPP for the Field Evaluation of Landfill Gas Control Technologies-Landfill C*. The following subsections assess MQOs for each measurement to determine if goals were achieved. When applicable, data validation elements performed on laboratory analytical reports are also included.

5.1.1 Continuous Emissions Monitors (CEMs)

Oxygen (O₂), CO/CO₂, SO₂ NO_x and THC were measured in the field using CEMs. The following MQOs were established for CEM measurements for Landfill C:

- Direct calibration bias: ±2 percent
- System bias checks: ±5 percent
- Zero and drift: ±3 percent
- Completeness: >90 percent

Direct calibrations were performed daily, prior to testing, at zero and a minimum of two other concentrations (typically a mid-level concentration and one point towards the end of the instrument range). System bias checks were performed pre-test and post-test. Drift checks were performed daily, post-test. Table 5-1 summarizes these QC checks for all instruments. All MQOs were met for Landfill C and were therefore, 100 percent complete.

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Table 5-1. Continuous Emissions Monitor (CEM) Measurement Quality Objectives (MQO) Summary for Landfill C

Instrument and Range	Direct Calibration ($\pm 2\%$ criteria)			System Bias Checks ($\pm 5\%$ criteria)			Drift Checks ($\pm 3\%$ criteria)		
	Total #	Bias Range (%)	Percent Complete	Total #	Bias Range (%)	Percent Complete	Total #	Bias Range (%)	Percent Complete
Servomex O ₂ Analyzer (0-21%)	18	0.1-1.5	100	24	0-3.1	100	12	0-0.8	100
Cal Analytical CO ₂ Analyzer (0-20%)	18	0-1.9	100	24	0.1-2.7	100	12	0-1.1	100
Cal Analytical CO Analyzer (0-650 ppm)	24	0-1.2	100	24	0-2.6	100	12	0-1.3	100
Cal Analytical SO ₂ Analyzer (0-500 ppm)	12	0.1-7.4	92	12	2.1-4.4	100	8	0-2.5	100
TECO THC Analyzer (0-1000 ppm)	NA ^a	NA ^a	NA ^a	18	0.1-2.2	100	6	0-1.9	100
TECO NO _x Analyzer (0-4000 ppm)	9	0-1.4	100	6	0.1-4	100	6	0-2.5	100

^a The method called for calibration gases to be introduced at a point of the sampling system close to the sampling probe for them to flow through the heated sample line. Calibration gases were not injected directly to the analyzer

5.1.2 Carbonyls (SW-846 Method 8315A)

The following MQOs were established in the QAPP for this method:

- Recovery (formaldehyde): 50-150 percent
- Completeness: >90 percent

Four samples (including one field blank) were submitted from Landfill C for formaldehyde and acetaldehyde determination to Resolution Analytics. Results were reported in RFA#RN990230. The report included information on instrument calibration and internal QC checks. Samples were collected on May 14, 2004 received by the laboratory on May 19, 2004 and analyzed on June 7, 2004, which met the 30 day hold-time limitation. Analytical detection limits were reported as 50 ppb for formaldehyde and 51.7 ppb for acetaldehyde.

The field blank (LDFLC-M0100-051404-FB) did not have detectable levels of either compound. To assess accuracy, an external performance evaluation audit (PEA) sample containing 1.25 ppm formaldehyde and acetaldehyde was analyzed with the sample set. Recovery was 101 percent for both compounds, which met the 50-150 percent MQO established in the QAPP. This spike was analyzed in duplicate with a percent difference (%D) between injections of 4.8 percent. All project samples were injected in duplicate and the %D range for formaldehyde was 0 to 4.5 percent and for acetaldehyde was 0 to 3.6 percent. All MQOs were met for this method for a completeness of 100 percent.

5.1.3 Hydrogen Sulfide (H₂S) (EPA Method 11)

The following MQOs were established in the Landfill C QAPP for this method:

- Accuracy: ±5 percent bias
- Completeness: >90 percent

Four samples plus reagent blanks were submitted from Landfill C for H₂S analysis by EPA Method 11 to Oxford Laboratories. The samples were collected on May 14, 2004 submitted on May 27, 2004 and analyzed on June 17, 2004, which exceeded the 30-day hold time established in the QAPP by three days.

One spike and one set of duplicates were also performed by the laboratory as addition QC checks. Spike recoveries were reported as 109 percent, which met the MQO. The duplication of sample LDFLC-PRE-M0011-51304-02 yielded a titration difference of only 0.3 ml. Although the final values were greater than 10 percent difference, this is an acceptable duplicate. The final difference is because of the small titration difference between the sample and the blank.

5.1.4 Dioxins and Furans (PCDD/PCDFs) (EPA Method 23/0011)

The following MQOs were established in the Landfill C QAPP for this method:

- Accuracy: 50-150 percent recovery
- Completeness: >90 percent

Five samples (including field blank and reagent blanks) from Landfill C were submitted for PCDD/PCDF analysis to ALTA Analytical Perspectives. Results were reported in Report #P4173. Detailed information on instrument calibration and laboratory quality assurance (QA)/QC was received with the analytical report. Samples were collected on May 14-15, 2004 received on May 26, 2004, extracted on June 1, 2004 and analyzed on June 11, 2004, which met the 14 day extraction and 30 day analysis hold-time requirements.

The field blank (LDFLC-POST-M23-051304-FB) did not have detectable levels of any dioxin or furan congeners or totals. The laboratory method blank was also clean. Mean recoveries of extraction standards ranged from 78 to 91 percent. Mean recoveries of sampling standards ranged from 95 to 101 percent. All MQOs were met and the achieved completeness for this measurement was 100 percent.

5.1.5 Polycyclic Aromatic Hydrocarbons (PAHs) (CARB 429)

The following MQOs were established in the Landfill C QAPP for this method:

- Accuracy: 50-150 percent recovery
- Completeness: >90 percent

Five samples (including field blank and reagent blanks) from Landfill C were submitted for PAH analysis to ALTA Analytical Perspectives. Results were reported in

Report #P4173. Detailed information on instrument calibration and laboratory QA/QC was received with the analytical report. Samples were collected on May 14-15, 2004, received on May 26, 2004, extracted on June 1, 2004, and analyzed on June 11, 2004, which met the 14 day extraction and 40 day analysis hold-time requirements.

There were reportable concentrations of PAHs detected in the field blank (LDFLC-POST-M23-051304-FB). Table 5-2 presents the amounts of the target analytes found in the blank samples and in the test samples. The amounts of PAHs in the test samples were significantly larger than those in the field blank sample and the method blank sample. Therefore, the presence of detectable quantities of PAHs in the blank samples did not affect the conclusions drawn from PAH analysis.

Recoveries for all extraction standards (ES) ranged from 53 percent to 115 percent with the exception of d₁₂-perylene, which was consistently below the acceptable limits. Sampling standards were all within acceptable limits ranging from 85.6 to 107 percent recovery. Because of the low recoveries of d₁₂-perylene, the reported concentrations of perylene were noted in the results in Table 4-14.

5.1.6 Non-Methane Organic Compounds (NMOCs) (Method 25C)

The following MQOs were established in the QAPP for Landfill C:

- Accuracy: ± 5 percent bias
- Completeness: >90 percent

Four canister samples (including a field blank) were submitted from Landfill C for NMOC analysis by Method 25-C to Triangle Environmental Services. The samples were collected on May 12-14, 2004, submitted on June 3, 2004, and analyzed June 7-22, 2004, which met the 30 day hold time requirements. The laboratory report included information on instrument calibration and internal QC checks.

Table 5-2. Amounts of Polycyclic Aromatic Hydrocarbons in Blank Samples and Test Samples

Analyte	Method Blank First Analysis Amount (ng)	Method Blank Second Analysis Amount (ng)	Amount found in Field Blank (ng)	Average Amount Found in Test Samples (ng)
Acenaphthene	1.14	1.2	3.74	2303
Acenaphthylene	ND	ND	0.885	6260
Anthracene	1.84	ND	3.85	1543
Benzo(a)anthracene	ND	ND	4.55	258
Benzo(a)pyrene	ND	ND	3.89	13
Benzo(b)fluoranthene	1.08	1.18	22.5	188
Benzo(g,h,i)perylene	ND	ND	6.77	25
Benzo(k)fluoranthene	ND	ND	6.08	45
Chrysene	0.434	ND	29.2	685
Dibenzo(a,h)anthracene	ND	ND	ND	12
Fluoranthene	3.58	3.34	201	1493
Fluorene	17.5	16	18.1	2933
Indeno(1,2,3-cd)pyrene	ND	ND	7.56	35
Naphthalene	968	768	10900	178000
Phenanthrene	13.3	11.7	113	11100
Pyrene	3.61	3.53	84.4	1200
2-Methylnaphthalene	14.6	11.9	60.5	27800
Benzo(e)Pyrene	ND	ND	ND	128
Perylene	ND	ND	ND	4

The only NMOC detected in the field blank (LDFLC-PRE-M40-051204-FB) was reported at 8 ppm as carbon. Sample concentrations were well above this value. Accuracy for the method was assessed by evaluating results of RF check samples that were run prior to and following sample analysis. Acceptance criteria established by the method is that the RF must be within 20 percent of the RF from initial calibration. All RF checks were within 10 percent of the initial calibration, well within the acceptance criteria. The %D between the pre and post-test checks were less than 1 percent. Samples were run in triplicate and all percent relative standard deviations (RSDs) for samples were <5 percent. The data set was determined valid. The MQOs for accuracy were met and the completeness achieved for this measurement was 100 percent.

5.1.7 Hydrogen Chloride (HCl) (EPA Method 26A)

The following MQOs were established in the QAPP for Landfill C:

- Accuracy: ± 10 percent bias
- Completeness: >90 percent

Four samples (including one field blank) were submitted from Landfill C for HCl and chlorine (Cl_2) determination to Resolution Analytics. Results were reported in RFA#RN990230. The report included information on instrument calibration and internal QC checks. Samples were collected on May 14, 2004, received on May 19, 2004, and analyzed on June 7, 2004, which met the 4 week hold-time requirement. Analytical detection limits were reported as 2.6 ppm for HCl and 2.5 ppm for Cl_2 .

The field blank (LDFLC-M26-051404-FB) submitted with samples did not have detectable levels of HCL of Cl_2 . In-house audit samples were analyzed with each respective group of field samples and fell within method criteria of 10 percent of their expected values. A matrix spike was performed on sample LDFLC-051404-3. An 0.8 mls sample was spiked with 0.8 mls of standard (50 ppm for HCl/25 ppm for Cl_2) and analyzed in triplicate. The laboratory reported 99 percent recovery of the HCl spike with a 0.4 percent RSD in triplicate injections and 102 percent recovery of the Cl_2 spike with a 0.3 percent RSD. This met the MQO of ± 10 percent with very good precision. In addition to the matrix spike, an internal QC check was performed after every 10 samples. All samples were measured in triplicate. Calculated bias for internal QC check was <1 percent for all measurements as was the %D between triplicates. All MQOs were met for 100 percent completeness.

5.1.8 Metals (EPA Method 29)

The following MQOs were established in the Landfill C QAPP for this method:

- Accuracy: ± 25 percent bias
- Completeness: >90 percent

Four sets of Method 29 Multi-Metals trains (including one field blank) were submitted from Landfill C for As, Cd, Cr, Pb, Mn, Hg, and Ni determination to First Analytical Laboratories. Results were reported in Project #40513. The report included information

on instrument calibration and internal QC checks. Samples were collected on May 14, 2004, received on May 19, 2004, and analyzed on May 24-26, 2004, which met the 14 day hold-time requirement. Method detection limits for each of the target metals were reported as follows:

- As = 5.0 µg/L
- Cd = 0.2 µg/L
- Cr = 5.0 µg/L
- Pb = 5.0 µg/L
- Mn = 5.0 µg/L
- Ni = 10 µg/L
- Hg = 0.2 µg/L

Traces of Cd, Cr, Mn, and Ni were found in the blanks, which is not unusual. Some of the back half Mn samples are abnormally high. This is a common problem that can occur in Method 29 if a tiny amount of the potassium permanganate reagent gets into the hydrogen peroxide impingers.

All samples were spiked prior to analysis. The Cd back half spike recovery was poor (56 percent), so the Cd back half analysis was conducted by the method of standard additions to overcome the problem. All of the other spike recoveries were within the acceptable range of 75-125 percent. In addition to spiking the samples, for each metal, internal calibration verification samples (ICVs) and continuing calibration verification samples (CCVs) were performed. ICVs were run at the beginning of each run set and CCVs were run at a frequency of 1 for every 10 samples. The ICVs and CCVs measured values were all $<\pm 10$ percent for all metals with the exception of Ni. Two of the four CCV measurements for Ni were slightly above the 10 percent acceptance criteria at 10.6 percent and 14.0 percent. This was not considered a major failure and data limitations were not applied. To evaluate precision, all samples were analyzed in duplicate. Whenever the %RSD for duplicate measurements exceeded 20 percent, the sample was re-analyzed. Though CCVs fell slightly outside of range for one metal (Ni), all other metals were within acceptance criteria and data use was not limited,

these analyses are considered 100 percent complete. The Ni results were notated in Table 4-16 to reflect the out-of-range CCV check.

5.1.9 Total Mercury (Hg) and Organo-mercury (Hg) (Frontier)

The following MQOs were established in the Landfill C QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

For Hg samples, replicates and spikes were incorporated into the sampling scheme. In addition, performance evaluation audit samples were also submitted to Frontier for analysis. Results from the PEA are summarized in Section 5.2.2.2.

Four total Hg samples (including a field blank) were taken at Landfill C. Samples were collected on May 13, 2004, extracted on May 28, 2004, and analyzed on June 3, 2004, which did not meet the 14 day hold-time established in the QAPP. All other QA measures indicated that the analysis of the traps were under good control. All field blanks were consistent with historical values and indicated the detection limit was likely to be at or below the previous estimated value of 50 ng/m³. Spike recoveries were >95 percent and standard deviation between replicates was 1.9 percent, which met MQOs and are 100 percent complete.

Six monomethyl mercury (MMHg) samples (including a field blank) were collected at Landfill C on May 13, 2004. These samples were extracted on May 27, 2004 but analyzed on May 28, 2004 which is one day past the 14 day hold-time. Analysis of these samples was under good control with acceptable distillation spike recoveries and distillation duplicates. All CCV standards had acceptable recoveries. One of the six gas sample was lost because of accidental back flush of the sampling pump by the operator. Spike recoveries were 80-117 percent, which met MQOs. The RSD between replicates was <10 percent. Because of the loss of one sample, MMHg sampling and analysis was 83 percent, which is slightly below the MQO.

Four dimethyl mercury (DMHg) samples (including a field blank) were collected at Landfill C on May 13, 2004. These samples were extracted and analyzed on May 27, 2004, which met the 14 day hold-time. The analysis of samples was well within control, with acceptable recoveries and good linear control standards and second source standard recoveries. One of the triplicate samples taken at Landfill C displayed

significantly lower concentrations compared to the other samples, potentially because inadequate purging of the sampling line dead volume. The low value could not statistically be excluded from the site average therefore the RSD for replicates at this site is elevated to 50.4 percent.

The field blank was low indicating that the trap media, handling procedures, and analytical techniques did not contribute to the reported values. Field matrix spike recoveries ranged from 50-93 percent. The DMHg analysis was 100 percent complete.

5.1.10 Volatile Organic Compounds (VOCs) and Methane (CH₄) (Method 0040/Method TO-15)

The following MQOs were established in the Landfill C QAPP for this method:

- Accuracy: 50-150 percent recovery
- Completeness: >90 percent

Four SUMMA canisters (including one field blank) were submitted from Landfill C to RTP Laboratories for VOC and CH₄ determination by EPA Method TO-15. Results were reported in Project #04-107. Samples were collected on May 13, 2004, received on May 20, 2004, and analyzed on May 25, 2004, which met the 30 day hold-time requirement.

Analysis of the field blank (LDFLC-PRE-M40-51304-FB) resulted in significant levels of several VOC compounds. Table 5-3 list the compounds identified in the field blank that were >1 ppbv. This should be considered when evaluating sample data.

To assess accuracy of the analytical method, a field spike was performed by injecting 2130 ppbv of chlorobenzene into the third canister (LDFLC-PRE-M40-051304-3). Recovery of the field spike was reported at 117 percent. Precision was demonstrated through multiple injection of standards at five concentrations. The RSD between the calculated relative RFs must be <30 percent with allowances that 2 may be >40 percent. The average RSD was 11.3 percent and method criteria were met for all compounds. This met the established MQOs. Valid data was received for all SUMMA canisters submitted; these analyses are considered to be 100 percent complete. The results in Table 4-1 were notated accordingly. Moreover, the measured average sample concentrations of these analytes were many folds the deleted blank concentrations. Therefore, conclusions that may have been drawn from these results are not affected materially.

Table 5-3. VOCs Identified in Field Blank

Compound	Blank Sample Concentration (ppbv)	Test Sample Average Concentration (ppbv)
Isopropyl alcohol	2.8	1280
Methylene chloride	9.4	5350
Acetone	13.5	11700
Tetrahydrofuran	35.6	1170
2-butanone	5.4	4570
Heptane	1.3	2860
Toluene	378	23300
MIBK	21.3	2170
Tetrachloroethylene	37	1690
1,1,2-trichloroethane	11.4	445
Ethylbenzene	1.5	5890
m/p-Xylene	5.8	9200
o-Xylene	1.5	3660
1,2,4-trimethylbenzene	1.8	1510

5.2 Audits

5.2.1 EPA Technical Systems Audit

EPA/APPCD QA Representative, Robert Wright, conducted an on-site technical systems audit (TSA) of the field evaluations at Landfill C on May 12-13, 2003. The ARCADIS approved QAPP and the associated field sampling manual provided the technical basis for the audit. The ARCADIS QA Officer, Laura Nessley, accompanied the EPA auditor during the TSA. A report of preliminary findings was received on May 19, 2004 and it is included below.

Source Test Report for Landfill C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL RISK MANAGEMENT RESEARCH LABORATORY
Air Pollution Prevention and Control Division
Research Triangle Park, NC 27711

May 19, 2004

MEMORANDUM

SUBJECT: Preliminary findings from technical systems audit conducted on May 12-13, 2004 of ARCADIS' field evaluation of landfill gas control technologies at landfill C

FROM: Robert S. Wright, Technical Services Branch

TO: Susan A. Thomeloe, Atmospheric Protection Branch

I conducted a technical systems audit (TSA) on May 12-13, 2004 of ARCADIS' field evaluation of landfill gas control technologies at Landfill C. This assessment was conducted according to auditing procedures described in *Guidance on Technical Audits and Related Assessments for Environmental Data Operations (EPA QA/G-7)*. ARCADIS' approved quality assurance project plan (QAPP) and its associated field sampling manual provided the technical basis for the TSA. The checklist for the TSA was sent to ARCADIS on May 9, 2004 and was distributed to the project staff prior to the audit. The following are preliminary findings of the audit.

1. In general, I observed that ARCADIS is doing a good job of evaluating landfill gas control technologies at Landfill C. ARCADIS' project staff are well qualified to perform the evaluation and they conducted themselves in a professional manner. They cooperated with me during the TSA and took time out from their busy duties to explain what was happening. They helped to ensure the successful completion of the TSA.
2. In general, the evaluation is being implemented as stated in the QAPP for the project.
3. There were significant disruptions of the testing schedule for reasons beyond ARCADIS' control: the long power loss at Landfill C on May 12; the malfunction of the internal combustion engine on May 12; the higher-than-expected pressure in the engine's exhaust stack on May 13; and inclement weather on May 13. ARCADIS' project staff responded well to these disruptions and modified the planned test matrix and schedule to allow completion of the most important measurements within the available time and funding. Some of these measurements were conducted on May 14.
4. Because some of the measurements were conducted after I had left on May 13 to return to North Carolina, the TSA did not cover all the items on the checklist. Given the general level of expertise and competence displayed by ARCADIS' project staff, I believe that the quality of the measurements that I did not observe is as high as the quality of the measurements that I was able to observe.

Source Test Report for Landfill C

5. Sampling for the total mercury and organo-mercury measurements was conducted by Lucas Hawking of Frontier Geosciences, Inc. He approached the sampling in a careful, competent, and professional manner. He followed the standard operating procedures (SOPs) for this sampling.
6. ARCADIS' project staff used both laboratory notebooks and data sheets to record data and observations during the evaluation. In several instances, this information was written in the laboratory notebooks without including the date and the name of the person recording this information. If there is not enough time during sampling activities to follow ARCADIS' procedures for laboratory notebooks, the project staff should add the date and name at the end of the day before they leave the site.
7. The field team leader had copies of equipment calibration certificates in a folder in his possession. However, the certificates of analysis for the gaseous calibration standards were attached to the cylinders under some plastic mesh and the cylinders were attached to the wall behind a table. It was difficult to read the certificates without disrupting the equipment. For future TSAs, ARCADIS may wish to include copies of the certificates of analysis for gaseous calibration standards in the folder to minimize testing disruptions.
8. No check weights were brought into the field to verify that the balance was operating correctly as was described in the QAPP. A crude quality control (QC) check was performed using the weights of known volumes of water and suggested that the balance was operating properly. Upon returning to North Carolina, the APPCD Metrology Laboratory will use NIST-traceable check weights to verify that the balance is operating properly. For future field evaluations, ARCADIS should ensure that check weights are taken with the balance.
9. A gas dilution system was used to calibrate the continuous emission monitors (CEMs) according to EPA Method 205. The ARCADIS CEMs operator had a copy of the September 17, 2003 calibration of this instrument in the APPCD Metrology Laboratory. However, a label containing information about this calibration was not affixed to the gas dilution system as is required by the method. ARCADIS should contact the APPCD Metrology Laboratory to obtain such a label.

A draft findings report for this TSA will be completed in the coming month. It is possible that it may contain additional findings that arise from closer consideration of the audit results, but I do not expect any new findings will address significant problems relating to the project.

Please contact me if you have any questions about the TSA or about this memorandum.

5.2.2 Laboratory Audits

Because of the developmental nature of the organo-Hg methods, an internal TSA and PEA were performed by ARCADIS at Frontier Geosciences (Frontier), located in Seattle, Washington.

5.2.2.1 Internal Technical Systems Audit (TSA)

In an effort to save project funds, a Senior Scientist at the ARCADIS Seattle office was asked to perform the laboratory audit, which would include observation of spiking procedures for MMHg and DMHg media prior to shipment to the field and subsequent analysis of project samples for MMHg, DMHg and total Hg. Ms. Laura Nessley provided Mr. Hicks with checklists to use during the audit. The audits of Frontier's spiking procedures were carried out on April 29, 2003, for MMHg and May 4, 2004, for DMHg and total Hg. Calibration, media spiking techniques, record keeping, and good laboratory practices were the focus of the audit, with special attention paid to the MMHg and DMHg spike preparation for the upcoming field effort. The following Frontier personnel and their associated positions were present for some or all of the audits conducted by ARCADIS.

Some of the primary observations resulting from the first audit included:

- A single source for calibration and spiking was used for MMHg and DMHg. The laboratory had not been able to locate other stable standards for use as an independent source. There were not National Institute of Standards and Technology (NIST)-traceable standards for organo-Hg.
- There were not expiration dates for primary MMHg and MDHg standard materials. The source of the MMHg standard had a 1998 date on the bottle.
- There are not written procedures for spiking of impinger solutions or carbon tubes.
- While work plans state that samples should be kept cold and the organometallic analytes are light sensitive, the analytical standard for MMHg was stored in a clear Teflon bottle on an un-refrigerated shelf across from a large picture window.

- Frontier did not routinely retain an aliquot of spike solution nor spiked traps when sending media to a field project.

The continuation of the earlier audit that focused on matrix spiking and media preparation was performed in late May 2004. This audit concentrated on the analysis of the sampling media sent to Landfill sites C and D, including extraction, analysis, and calibration procedures for MMHg, DMHg, and total Hg. These audits were conducted on three separate days to accommodate Frontier's analysis schedule. On May 27, 2004, the audit focused on MMHg extraction and distillation and DMHg analysis. On May 28, 2004 MMHg analysis and total Hg extraction procedures were audited. On June 3, 2004, the procedures for total Hg analysis were audited.

Significant findings and recommendations resulting from the extraction and analysis portion of the laboratory audit included:

- **Efficiency factor (EF).** An efficiency factor (EF) based on average results from the analyses of distillation blanks was applied to all MMHg sample results. This practice was not discussed in the narrative portion of the Frontier reports and not mentioned by name in the standard operating procedures (SOPs) provided to ARCADIS. This technique essentially boosts analyte recoveries through a multiplied efficiency factor applied to all MMHg results. The current EF is 89.5 percent, therefore all results were normalized to 100 percent recovery levels. For example, a measured value of 100.0 ng detected in an environmental sample was corrected to 110.5ng after applying the EF. Without a data report disclaimer, this practice misrepresents the results and biases all MMHg results high.
- **Method blank subtraction.** Frontier subtracts the average of the method blanks from each extraction/preparation batch. While scientifically valid, this technique is not acceptable for most EPA-referenced protocols. The laboratory has a responsibility only to report blank concentrations, and it should be the responsibility of the client to adjust environmental sample concentrations through a data evaluation/validation process.
- **MMHg Instrument stability.** The MMHg analysis was performed over a 2-day period because of poor instrument stability and issues associated with efficiency of the ethylating reagent. Initially, two instruments were set up for calibration on May 27th. Only one of the instruments showed sufficient sensitivity and stability to continue analysis. Unfortunately, the initial calibration curve did not meet method specifications, so the instrument was recalibrated and environmental samples

analyzed while the ARCADIS auditor was present. The following day, the auditor was informed that the sample set did not meet the QAPP requirements because of unexpected lower concentrations in the samples. The samples were successfully reanalyzed the following day after maintenance was performed on the MMHg analysis instrument. Reanalyzing samples is apparently common and sometimes entire sample sets are analyzed more than once. Frontier stated that it is “the nature” of this analysis to have to frequently recalibrate and reanalyze samples. Calibrations should be closely reviewed during data validation.

- **Calibration Curve Forcing:** ARCADIS learned that, in accordance with Frontier policy, all calibration curve origin points were forced through zero. This procedure is not consistent with most EPA-promulgated methods. ARCADIS recommends reprocessing one calibration curve to determine the impact, if any, to the data.
- **Retention Time Marking:** While observing the MMHg analysis, the analyst did not mark the beginning of the analysis charts with a “tick” time marker, which is particularly critical given that identification of MMHg is primarily by retention times or relative retention times. Some of the samples being analyzed had numerous chromatographic peaks including MMHg and other forms of Hg. Based on observation of other laboratory “pods” within Frontier, the marking of the actual start time on the strip chart recorder was not standardized as a procedural practice. Some analysts mark the desorption time on the strip chart recorder and others do not. However, marking of analysis start times should be a requirement of each method in the place of automatic chromatographic data collection (integrators or computer data acquisition) to avoid misidentification of analyte targets. ARCADIS recommends the standardization of marking the start of analysis on strip chart recorders.
- **Digestate Dilution Technique:** The method of bringing the digested total Hg to quantitative volume in a 20 milliliter glass vial was unusual as the technique does not rely on marked, calibrated Class A or B glassware when bringing digested samples to a known quantitative volume. The analyst did not know if the volume of the unmarked vials was recently compared against calibrated glassware, but assumed it was 20 mL. The analyst consistently brought the digested samples to a consistent level that corresponded to the neck of the glass vial. At a minimum, the vials should be calibrated to assure the final volumes are accurate.
- **Sample/Standard Storage:** One refrigerator (“A”) and one freezer (“A”) used to store samples, analytical standards, and frozen ethylating cocktails were not

monitored for 3 days prior to the audit (5/25/04). This did not appear to be a systematic problem, but the analyst did not have an explanation. Verification of temperatures in standard and sample storage areas should be checked daily.

- **Calibration Verification:** While discussed in the previous ARCADIS Audit report dated May 17, 2004, this observation is again included because it is critical to the evaluation of the laboratory and the application of these methods to raw LFG monitoring. Frontier uses a single source for calibration and spiking for MMHg and DMHg methods. The laboratory has not been able to locate other acceptable, stable standards, such as NIST-traceable standards. Frontier utilizes Standard Reference Materials and certified standards however, accuracy is only measured for MMHg by comparison to a digested tissue standard and for DMHg by comparison to JSI-1, a material from the JSI Institute in Slovenia. ARCADIS recommends that Frontier make an effort to locate alternate acceptable accuracy standards to verify true concentrations of the main calibration standards.
- **Holding Times:** Holding times are generally not an issue with most analyses Frontier performs, but based on the QAPP, specific holding times to analysis apply to this analysis. This was not documented in the summary report; however the total, MMHg and DMHg analyses were extracted, but not all analyzed within the 14 day holding time assuming May 27th was the 14th day after sampling. Some data qualification might be necessary, depending on the professional judgment of the data validator.

5.2.2.2 Internal Performance Evaluation Audit (PEA)

Because there is currently not a promulgated method for organo-Hg sampling and analysis, PEA samples were integrated in to the sampling matrix to evaluate accuracy and precision of the methods used by Frontier. ARCADIS subcontracted an independent laboratory to assist in preparation of the PEA samples. The laboratory was Cebam Analytical located in Seattle, Washington. All standards and stock solutions were prepared and verified by a Cebam Analytical analyst.

Two PEA samples were prepared for total Hg. Trap A was spiked with 9.99 ng total Hg by a Cebam analyst. This concentration was verified by Cebam by performing six replicate analyses. Samples were analyzed by Frontier Geosciences as described in the report titled: Determination of Total, Dimethyl, and Monomethyl Hg in raw LFG at Pinconning and Montrose Michigan. Recovery results are presented in Table 5-3. Relative percent difference (RPD) between the duplicate samples was 1.0 percent.

Table 5-3. Total Mercury PEA Results

Sample ID	Total Hg Measured (ng)	Total Hg Spiked (ng)	Recovery (%)
C-052104-01	13.60	9.99	136
C-052104-02	13.47	9.99	135

One PEA sample was prepared and analyzed for MMHg. A 2.0 ng/l spiking solution was prepared by transferring a 0.2 ml aliquot of 10 ng/ml standard into a 1-l pre-cleaned glass volumetric flask. The sample was analyzed by Frontier as described in the report titled: Determination of Total, Dimethyl, and Monomethyl Mercury in raw LFG at Pinconning and Montros, Michigan. Recovery results are presented in Table 5-4. Because only one sample was prepared, precision for this analysis could not be evaluated.

Table 5-4. MMHg PEA Results

Sample ID	Total MMHg Measured (ng/L)	Total MMHg Spiked (ng/L)	Recovery (%)
040513-BR-MHg7	2.327	2.00	117

Two PEA samples were prepared and analyzed for DMHg. Trap A and Trap B were spiked with 0.215 ng DMHg for a total concentration of 0.430 ng per train. This concentration was verified by Cebam by analyzing five replicates samples of the standard.

The samples were analyzed by Frontier as described in the report titled: Determination of Total, Dimethyl, and Monomethyl Mercury in raw LFG at Pinconning and Montros, Michigan. Recovery results are presented in Table 5-5. RPD between the duplicate samples was 23 percent.

Table 5-5. DMHg PEA Results

Sample ID	Total MMHg Measured (ng)*	Total MMHg Spiked (ng)*	Recovery (%)
Arcadis DMM Spike #1	0.234	0.430	54.4
Arcadis DMM Spike #2	0.295	0.430	68.6

*Trap A and Trap B together

In conclusion, the MQO for recovery for total Hg and organo-Hg samples (as defined in the QAPP) was established at 50 to 150 percent. All PEA samples met this objective. The RPD between duplicate samples was also acceptable. The full text of the TSA and PEA audit reports and completed checklists are included in Appendix S.

**Source Test Report
for Landfill C**

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**Field Test Measurements at Five Municipal Solid
Waste Landfills with Landfill Gas Control Technology
Final Report**

**Appendix D
SOURCE TEST REPORT
FOR LANDFILL D**

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- B. Method 25C (CH₄, CO₂, NMOC)
- C. Method 3C (O₂, N₂, CH₄, CO₂)
- D. Method TO-11 (Formaldehyde, Acetaldehyde)
- E. Organic mercury Method (Mercury, Total, Monomethyl, Dimethyl)
- F. LUMEX (Elemental Mercury)
- G. Hydrogen Sulfide
- H. Continuous Emission Monitor (Data and Charts)
- L. Method 29 (Metals)
- M. Method 26A (HCl)
- N. Analyte Concentration and Mass Flow Rate Computation Worksheets
- P. Raw Field Data Records
- Q. CEM Calibration Records and Span Gas Certification
- R. Sampling Control Meter Boxes Calibration Record

Acronym List

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Acronym List

Acronym List

%D	Percent difference
AP-42	Compilation of Air Pollutant Emission Factors
APPCD	Air Pollution Prevention Control Division
ARCADIS	ARCADIS G&M, Inc.
As	Arsenic
CCVs	Continuing calibration verification samples
Cd	Cadmium
CEMS	Continuous emission monitoring system
CH ₄	Methane
Cl ₂	Chlorine
CO	Carbon monoxide
CO ₂	Carbon dioxide
Cr	Chromium
DMHg	Dimethyl mercury
EF	Efficiency factor
EPA	US Environmental Protection Agency
FID	Flame ionization detector
Frontier	Frontier Geosciences
GC/FID	Gas chromatograph/flame ionization detector
HCl	Hydrogen chloride
Hg	Mercury
H ₂ S	Hydrogen sulfide
ICVs	Internal calibration verification samples
LFG	Landfill gas
MMHg	Monomethyl mercury
Mn	Manganese
MQOs	Measurement quality objectives
MSW	Municipal solid waste

Acronym List

N ₂	Nitrogen
Ni	Nickel
NMOCs	Non-methane organic compounds
NO _x	Nitrogen oxides
O ₂	Oxygen
PAHs	Polynuclear aromatic hydrocarbons
Pb	Lead
PEA	Performance evaluation audit
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality control
RF	Response factor
RPD	Relative percent difference
RRF	Relative response factors
RSD	Relative standard deviation
RTP	Research Triangle Park
SO ₂	Sulfur dioxide
SOPs	Standard operating procedures
SVOC	Semi-volatile organic compounds
TCDD/TCDFs	Dioxins/furans
THCs	Total hydrocarbons
TSA	Technical systems audit
VOCs	Volatile organic compounds

1. Introduction

Large municipal solid waste (MSW) landfills are subject to Clean Air Act regulations because of concerns related to their emissions and their potential adverse effects to human health and the environment. Landfills are listed as a source of air toxics in the Urban Air Toxics Strategy for future evaluation of residual risk. Existing emission factors for landfill gas (LFG) were largely developed using data from the 1980s and early 1990s. A database was developed summarizing data from approximately 1,200 landfills, along with emissions information from literature, test reports prepared by state and local government agencies, and industry. These data were summarized in *Compilation of Air Pollutant Emission Factors (AP-42)*, Chapter 2.4. The final rule and guidelines are contained in 40 CFR Parts 51, 52, and 60, *Standards of Performance for New Stationary Sources and Guidelines for Control of Existing Sources: Municipal Solid Waste Landfills*.

The overall purpose of this testing program was to generate data that could be used to update AP-42 and to include data that reflect current waste management practices.

This report presents the results of a field test conducted at Landfill D, located in a Midwest industrial state. Testing took place on May 15 and 16, 2004. Data from the raw gas volatile organic compounds (VOCs) samples showed that an error had occurred. Collection of samples to replace the defective samples was conducted on September 14, 2004.

The site uses an enclosed flare for destruction of the LFG. A more detailed description of the flare system is presented in Section 2. The specific purpose of the testing program was to determine emissions from the raw pipe and from the flare stack. The pollutants of interest for the raw untreated LFG were VOCs, non-methane organic compounds (NMOCs), hydrogen sulfide (H₂S), carbonyls (acetaldehyde, formaldehyde), and mercury (Hg) compounds. The pollutants of interest for the treated LFG, in this case at the enclosed flare stack, were carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), NMOCs as total hydrocarbons (THCs), hydrogen chloride (HCl), total Hg and metals.

ARCADIS Geraghty & Miller, Inc. (ARCADIS) as contractor to the US Environmental Protection Agency (EPA) Air Pollution Prevention and Control Division (APPCD), performed this work under Work Assignment 0-27 of Onsite Laboratory Support Contract (EP-C-04-023). The testing activities followed the specifications of the approved *Site-Specific Quality Assurance Project Plan for the Field Evaluations of Landfill Gas Control Technologies Landfill* dated October 2003.

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2. Landfill Facility Descriptions

Available information indicated that the site began operation in 1991. Based on information provided by the site operator, Landfill D has approximately 2,350,000 tons of waste in place as of August 2004. The waste covered an area of 31 acres. The LFG generated at the landfill were extracted with 21 vertical wells producing a total of 400 cubic feet per minute. The collected LFG was piped to the enclosed flare system for combustion.

2.1 Flare Process Description and Operation

A John Zink Model 72 Enclosed Ground Flare Station, rated at maximum LFG input rate of 695 scfm, received and destroyed the collected LFG. Figure 2-1 shows a simplified process schematic of the flare system. A condensate removal system prevented liquids from entering into the flare burners. A flame arrestor prevented flame from propagating from the burner array back into the LFG collection and flow control system. A burner array and an automatic louver system controlled gas and air distribution to achieve proper combustion. The unit could be operated satisfactorily within a 5-to-1 turndown ratio (from 20.9 to 4.0 MMBtu/hr). The system did not have provisions for heat recovery.

According to manufacturer information, the John Zink Enclosed Ground Flare Station was designed for a minimum residence time of 0.7 seconds at 1800 °F to insure thermal destruction of CO and hydrocarbons, with minimal production of NO_x. Specific information related to the system's ability to destroy or reduce other potential pollutants was not available.

2.2 Sampling Locations

Raw LFG sampling was conducted at the pipe feeding the John Zink enclosed ground flare station and the flare stack as depicted in Figure 2-1.

2.2.1 Raw Landfill Gas (LFG) Header Pipe

Raw untreated LFG samples were collected from the header pipe, upstream of any processing units. The pipe was buried underground. Access to the pipe for sampling was achieved by excavating the soil above and around the pipe. Figure 2-2 is a photograph of the LFG inlet pipe. The pipe was 11 inches in inner diameter before it connects to the gas control-and-process system. At the sampling point, four ¼ inch gas

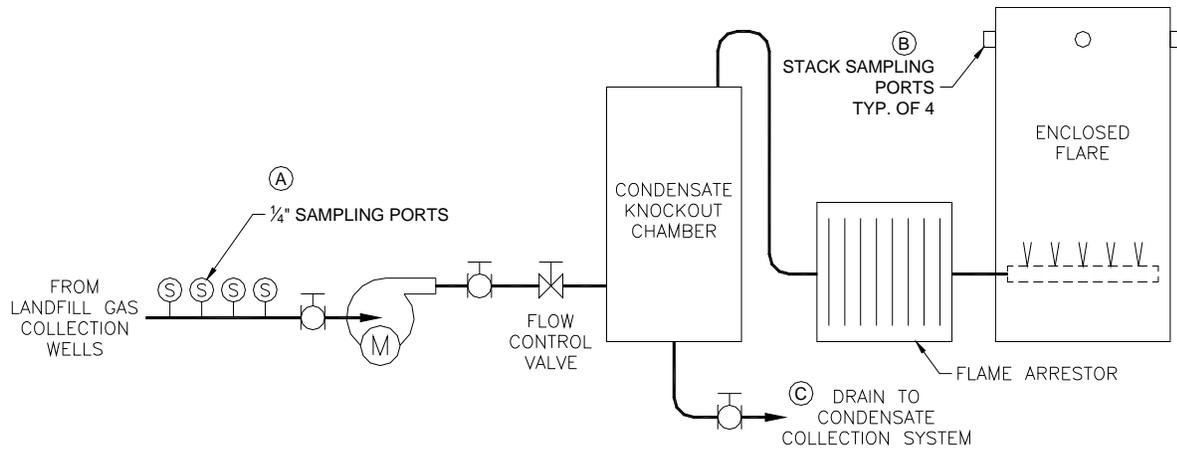


Figure 2-1. Simplified Flare Process Flow Diagram and Sampling Points



Figure 2-2. Raw Landfill Gas Collection Pipe

taps were installed and gases were withdrawn through these ports to obtain the test samples.

Comparing the physical arrangement of the header pipe with the requirements of standard sampling methodologies indicated that the header configuration rendered isokinetic sampling at the gas collection pipe impossible. Therefore, isokinetic sampling was not attempted at this location. Collected data showed that the particulate loading in the sample was very low, confirming that the effect of not strictly adhering to isokinetic sampling rates was insignificant.

2.2.2 Flare Stack

A picture of the flare stack and the arrangement of the sampling ports are shown in Figure 2-3. The flare stack was 72 inches in diameter and had two 4-inch sampling ports installed 90 degrees apart. Figure 2-4 is a schematic of the flare stack and it includes the locations of the sample traverse points. Isokinetic sampling was possible at this location and was followed.



Figure 2-3. Enclosed Flare Unit Showing Stack Sampling Ports

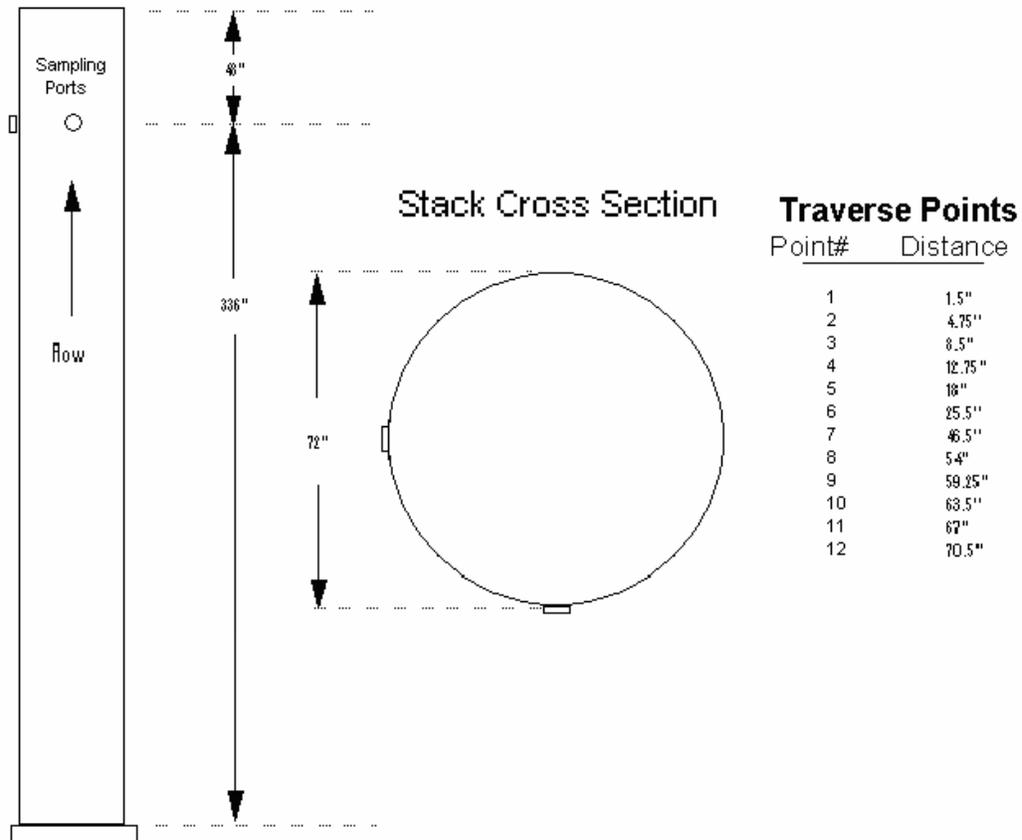


Figure 2-4. Flare Stack Dimension and Sampling Traverse Locations

3. Test Operations

As stated previously, the purpose of the sampling program was to determine the concentrations of the target analytes in the raw LFG at the header pipe and emissions from the flare stack.

3.1 Test Team

The tests were conducted by a team of seven individuals. The team members and their primary duties are listed in Table 3-1.

Table 3-1. Test Team Members and Responsibilities

Role	Primary Duty
Test Engineer	Field Supervisor
Test Engineer	CEM operator
Test Engineer	Sample train preparation and recovery
Test Engineer	Sample train operator at LFG inlet pipe
Sampling Technician	Sample train operator at stack
Senior Chemist	Mercury measurements
Senior Chemist (Frontier Geosciences)	Mercury measurements

3.2 Test Log

3.2.1 Planned Test Sample Matrices

The list of target samples to be collected and measurements to be conducted were specified in the Quality Assurance Project Plan (QAPP) Revision 1 dated May 2004. These are reiterated here for completeness. Tables 3-2 lists the target compounds of interest for the raw untreated LFG. Table 3-3 lists the target compounds of interest for the treated gas, collected at the flare stack.

Table 3-2. Target Analytes for the Raw Landfill Gas

Volatil e compounds	Volatil e compounds (continued)	Carbonyls
Methane	Ethylene dibromide	Acetaldehyde
Ethane	Ethylene dichloride	Formaldehyde
Propane	Methyl chloroform	
Butane	Methyl isobutyl ketone	Mercury
Pentane	Methylene chloride	Organo-mercury compounds
Hexane	Propylene dichloride	Total
Carbonyl sulfide	t-1,2-Dichloroethene	Elemental
Chlorodifluoromethane	Tetrachloroethene	
Chloromethane	Toluene	Gases
Dichlorodifluoromethane	Trichlorethylene	Carbon Dioxide
Dichlorofluoromethane	Vinyl chloride	Oxygen
Ethyl chloride	Vinylidene chloride	
Fluorotrichloromethane	Ethanol	
1,3-Butadiene	Methyl ethyl ketone	
Acetone	2-Propanol	
Acrylonitrile	1,4-Dichlorobenzene	
Benzene	Ethylbenzene	
Bromodichloromethane	Xylenes	
Carbon disulfide		
Carbon tetrachloride		
Chlorobenzene	Non-methane organic compounds	
Chloroform		
Dimethyl sulfide	Reduced sulfur compounds	
Ethyl mercaptan	Hydrogen sulfide	

Table 3-3. Target Analytes for the Flare Stack Outlet Gas Stream

Gases	Dioxins/Furans
Oxygen	Polycyclic aromatic hydrocarbons
Carbon dioxide	
Carbon Monoxide	Mercury
Nitrous Oxides	Total
Sulfur Dioxide	
Total Hydrocarbons	
Non-methane organic compounds (as Total Hydrocarbons)	Metals
	Lead, Arsenic, Cadmium, Chromium, Manganese, Nickel
Hydrogen chloride	

3.2.2 Raw Landfill Gas (LFG) Pipe (Inlet)

Sample collection took two days to complete. Table 3-4 lists the samples that were collected from the LFG pipe. Figure 3-1 is a photograph of the sampling team in action at this sample location.

3.2.3 Flare Stack

Sampling at the flare stack was conducted by accessing the sampling ports with the aid of a scaffold. Figure 3-2 shows the flare and the sampling scaffold platform. Figure 3-3 shows a sampling in place during sample collection on the enclosed flare stack.

**Source Test Report
for Landfill D**

Table 3-4. Raw Landfill Gas Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 40 (TO-15/25C, 3C) ^a					
	D-Pre-M40-051504-01	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	05/15/04	12:43 - 13:44
	D-Pre-M40-051604-02	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	05/16/04	09:56 - 10:55
	D-Pre-M40-051604-03	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	05/16/04	11:43 - 12:43
	D-Pre-M40-051604-0FB	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Field Blank	05/16/04	14:27
	D-Pre-M40-091404-01	VOCs/NMOCs	Test	09/14/04	10:32 - 11:32
	D-Pre-M40-091404-02	VOCs/NMOCs	Test	09/14/04	12:08 - 13:08
	D-Pre-M40-091404-03	VOCs/NMOCs	Test	09/14/04	13:43 - 14:43
	D-Pre-M40-091404-FB	VOCs/NMOCs	Field Blank	09/14/04	15:11 - 15:53
	D-Pre-M40-091404-04	VOCs/NMOCs	Field Blank	09/14/04	16:05 - 17:05
EPA Method 0100					
	D-Pre-M0100-051604-01	Carbonyls	Test	05/16/04	15:25 - 15:57
	D-Pre-M0100-051604-02	Carbonyls	Test	05/16/04	15:52 - 16:04
	D-Pre-M0100-051604-03	Carbonyls	Test	05/16/04	16:05 - 16:36
	D-Pre-M0100-051604-0FB	Carbonyls	Field Blank	05/16/04	14:58
EPA Method 11					
	D-Pre-M0011-051504-01 ^b	H ₂ S	Test	05/15/04	13:47 - 13:57
	D-Pre-M0011-051604-02	H ₂ S	Test	05/16/04	10:42 - 10:53
	D-Pre-M0011-051604-03	H ₂ S	Test	05/16/04	11:56 - 12:07
	D-Pre-M0011-051604-04	H ₂ S	Test	05/16/04	12:51 - 13:02
	D-Pre-M0011-051604-FB	H ₂ S	Field Blank	05/16/04	13:40
Lumex Instrument					
	D-Pre-EM-051604-01	Elemental Hg ^c	Test	05/16/04	09:15 - 09:17
	D-Pre-EM-051604-02	Elemental Hg ^c	Test	05/16/04	13:10 - 13:12
	D-Pre-EM-051604-03	Elemental Hg ^c	Test	05/16/04	15:10 - 15:12

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
Frontier					
	040515-WF-STM1	Total gaseous Hg	Test	05/15/04	11:51 - 12:37
	040515-WF-STM2	Total gaseous Hg	Test	05/15/04	13:10 - 13:50
	040515-WF-STM4	Total gaseous Hg	Test	05/15/04	14:32 - 15:22
	040515-WF-STM3BLK	Total gaseous Hg	Field Blank	05/15/04	14:15
Frontier					
	040515-WF-MHg5Spike	Monomethyl Hg	Spike	05/15/04	16:10 - 17:04
	040515-WF-MHg3BLK	Monomethyl Hg	Field Blank	05/15/04	14:15
	040515-WF-MHg1	Monomethyl Hg	Test	05/15/04	11:53 - 12:40
	040515-WF-MHg2	Monomethyl Hg	Test	05/15/04	13:12 - 13:59
	040515-WF-MHg4	Monomethyl Hg	Test	05/15/04	14:33 - 15:22
Frontier					
	040515-WF-DMHg5Spike	Dimethyl Hg	Spike	05/15/04	17:42 - 17:45
	040515-WF-DMHg6TripSpk	Dimethyl Hg	Trip Spike	05/15/04	17:55
	040515-WF-DMHg7	Dimethyl Hg	Volume Experiment	05/15/04	18:00 - 18:03
	040515-WF-DMHg8	Dimethyl Hg	Volume Experiment	05/15/04	18:15 - 18:26
	040515-WF-DMHg3BLK	Dimethyl Hg	Field Blank	05/15/04	17:15
	040515-WF-DMHg1	Dimethyl Hg	Test	05/15/04	16:41 - 16:43
	040515-WF-DMHg2	Dimethyl Hg	Test	05/15/04	16:58 - 17:00
	040515-WF-DMHg4	Dimethyl Hg	Test	05/15/04	17:29 - 17:31

^a The Method 40 SUMMA canister contents were first analyzed for speciated VOCs, then analyzed for NMOCs by Method 25C

^b Sampling train back flushed at end of run; run repeated

^c Represents average of 3 readings, each 30-second in duration



Figure 3-1. Sampling Operations at the Raw Landfill Gas Pipe Inlet



Figure 3-2. Sampling Operations at the Enclosed Flare



Figure 3-3. Sampling Train in Place on the Enclosed Flare Stack

The flare stack was sampled for NMOCs (as THC_s), HCl, lead (Pb), arsenic (As), cadmium (Cd), chromium (Cr), manganese (Mn), nickel (Ni), total Hg, SO₂, NO_x, CO, carbon dioxide (CO₂), and oxygen (O₂). Table 3-5 lists the test samples that were collected from the flare stack.

The flare stack cross-section was divided into 24 equal areas according to EPA Method 1. Sampling at the flare stack was conducted at isokinetic conditions. Sample collection times for the Method 26A HCl train and the Method 29 metals train were 60-minutes. Run time for continuous emission monitoring system (CEMS) parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) was 60 minutes.

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Table 3-5. Flare Stack Test Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 3A (CEM)					
	D-Post-M3A-051604-01	O ₂	Test	05/16/04	10:40 - 11:39
	D-Post-M3A-051604-02	O ₂	Test	05/16/04	12:20 - 13:19
	D-Post-M3A-051604-03	O ₂	Test	05/16/04	14:40 - 15:39
EPA Method 3A (CEM)					
	D-Post-M3A-051604-01	CO ₂	Test	05/16/04	10:40 - 11:39
	D-Post-M3A-051604-02	CO ₂	Test	05/16/04	12:20 - 13:19
	D-Post-M3A-051604-03	CO ₂	Test	05/16/04	14:40 - 15:39
EPA Method 10 (CEM)					
	D-Post-M10-051604-01	CO	Test	05/16/04	10:40 - 11:39
	D-Post-M10-051604-02	CO	Test	05/16/04	12:20 - 13:19
	D-Post-M10-051604-03	CO	Test	05/16/04	14:40 - 15:39
EPA Method 7E (CEM)					
	D-Post-M7E-051604-01	NO _x	Test	05/16/04	10:40 - 11:39
	D-Post-M7E-051604-02	NO _x	Test	05/16/04	12:20 - 13:19
	D-Post-M7E-051604-03	NO _x	Test	05/16/04	14:40 - 15:39
EPA Method 6C (CEM)					
	D-Post-M6C-051604-01	SO ₂	Test	05/16/04	10:40 - 11:39
	D-Post-M6C-051604-02	SO ₂	Test	05/16/04	12:20 - 13:19
	D-Post-M6C-051604-03	SO ₂	Test	05/16/04	14:40 - 15:39
EPA Method 25A (CEM)					
	D-Post-M25A-051604-01	NMOCs (THC)	Test	05/16/04	10:40 - 11:39
	D-Post-M25A-051604-02	NMOCs (THC)	Test	05/16/04	12:20 - 13:19
	D-Post-M25A-051604-03	NMOCs (THC)	Test	05/16/04	14:40 - 15:39
Lumex Instrument					
	D-Post-EM-051604-01	Elemental Hg ^a	Test	05/16/04	09:15 - 09:17
	D-Post-EM-051604-02	Elemental Hg ^a	Test	05/16/04	13:10 - 13:12
	D-Post-EM-051604-03	Elemental Hg ^a	Test	05/16/04	15:10 - 15:12

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 26A					
	D-Post-M26A-051604-01	HCl	Test	05/16/04	10:35 - 11:38
	D-Post-M26A-051604-02	HCl	Test	05/16/04	13:03 - 14:05
	D-Post-M26A-051604-03	HCl	Test	05/16/04	15:00 - 16:02
EPA Method 29					
	D-Post-M29-051604-01	Metals	Test	05/16/04	10:34- 11:38
	D-Post-M29-051604-02	Metals	Test	05/16/04	13:02 - 14:05
	D-Post-M29-051604-03	Metals	Test	05/16/04	14:59 - 16:04

^a Represents 3 readings, each 30-seconds in duration

3.3 Field Test Changes and Deviations from Quality Assurance Project Plan (QAPP) Specifications

3.3.1 Variation from Test Methods or Planned Activities

3.3.1.1 *Sampling at the Raw Landfill Gas (LFG) Pipe*

There were not variations from test methods or planned activities at the LFG pipe.

3.3.1.2 Raw Landfill Gas (LFG) Condensate Sample

A LFG pipe condensate sample was not specified in the QAPP and was not collected.

3.3.1.3 Raw Landfill Gas (LFG) Flow Rate Measurement

Gas flow as indicated by the John Zink enclosed ground flare station control panel was recorded. The accuracy of the indicated measurement cannot be independently verified because of the inability to measure gas velocity accurately, as discussed in the previous section. The test team was only able to make crude velocity measurements by traversing the pipe using a standard pitot probe. The accuracies of these measurements are uncertain and do not agree closely with the control panel indicated flows which were more stable and likely to be more accurate.

3.3.1.4 Enclosed Flare Stack

There were not variations from test methods or planned activities at the enclosed flare stack.

3.3.2 Application of Test Methods

The sampling and, where applicable, analytical methods used in this test program follow those specified in the QAPP. Sampling methods are shown in Table 3-6

3.3.3 Test Method Exceptions

Laboratory analytical procedures followed those prescribed by the specified methods, with the following exceptions for the stack flare:

- Non-Methane Organic Compounds (NMOCs) - Method 25A was used instead of the specifically applicable Method 25C. This was necessitated by the low overall VOC concentrations in the flare stack gas (<50 ppm as hexane). Moreover, Method 25C is specifically designed for and applicable to raw LFG. As such, the test method is not applicable to the combustion effluents from the flare stack.
- Polycyclic aromatic hydrocarbons (PAH) were analyzed by CARB Method 429 as opposed to Method 8270. However, these methods are comparable because CARB Method 429 contains procedures for sampling, sample recovery, clean-up, and analysis. Method 8270 is strictly an analytical method. CARB Method 429 is specific to 19 PAHs, the target analytes of this portion of the specified tests. The 19 PAHs are a subset of the more than 200 target analytes listed for Method 8270 for semi-volatile organic compounds (SVOC). Though specific compounds called out for use in instrument performance verifications, internal standard preparation, surrogate standards, and continuing calibration verifications/ calibration checks are slightly different, both methods require them. CARB Method 429 adds another level of quality control (QC) with a required recovery standard. Method performance and acceptance criteria for recoveries are better defined in CARB Method 429 and meet or exceed those stated in Method 8270C. As long as any additional compounds reported by the laboratory using CARB Method 429 are included in the calibration standards and acceptable response factors are demonstrated, using CARB Method 429 is essentially equivalent to using SW-846 Method 8270.

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Table 3-6. Sampling Methods

Procedure	Description	Organization Performing Analysis
EPA Method 1	Selection of enclosed flare stack traverse points	ARCADIS G&M
EPA Method 2	Determination enclosed flare stack of stack gas velocity and volumetric flow rate	ARCADIS G&M
EPA Method 3A	Determination of oxygen (O ₂) and carbon dioxide (CO ₂) for enclosed flare stack gas molecular weight calculations	ARCADIS G&M
EPA Method 3C	Determination of carbon dioxide (CO ₂), methane (CH ₄), nitrogen (N ₂), and oxygen (O ₂) in raw LFG	Triangle Environmental Services
EPA Method 4	Determination of enclosed flare stack gas moisture	ARCADIS G&M
EPA Method 6C	Determination of enclosed flare stack sulfur dioxide (SO ₂)	ARCADIS G&M
EPA Method 7E	Determination of enclosed flare stack nitrogen oxides (NO _x)	ARCADIS G&M
EPA Method 10	Determination of enclosed flare stack carbon monoxide (CO)	ARCADIS G&M
EPA Method 11	Determination of raw LFG hydrogen sulfide (H ₂ S)	Oxford Laboratories
EPA Method 25A	Determination of enclosed flare stack gas non-methane organic compounds (NMOCs)(as total hydrocarbons [THCs])	ARCADIS G&M
EPA Method 25C	Determination of raw LFG NMOCs (performed on Method 40 SUMMA canister sample)	Triangle Environmental Services
EPA Method 26A	Determination of raw LFG hydrogen chloride (HCl)	Resolution Analytics
EPA Method 29	Determination of enclosed flare stack metals	First Analytical Laboratories
EPA Method 40	Determination of raw LFG volatile organic compounds (VOCs)	Research Triangle Park Laboratories
SW-846 Method 0100/TO-11	Determination of raw LFG carbonyls (formaldehyde, acetaldehyde)	Resolution Analytics
LUMEX Instrument	Determination of raw LFG and enclosed flare stack elemental mercury (Hg ⁰)	ARCADIS G&M
Frontier Geo. Methods	Determination of raw LFG: Monomethyl mercury Dimethyl mercury Total mercury	Frontier Geosciences

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4. Presentation of Test Results

Testing took place at the Landfill D on May 15 and 16, 2004. Results of the testing are presented in this section. Detailed test results are included in the Appendices. The following subsections provide concise summaries of the test results.

4.1 Raw Landfill Gas (LFG) Results

As shown in Figure 2-2, sampling was conducted by extracting samples via the four ¼-inch ports installed in the LFG pipe.

4.1.1 Raw Landfill Gas (LFG) Flow Rate and Temperature

4.1.1.1 Direct Measurements

The facility process system had a flow measurement system, which displays the flow rate on an instrument panel meter. The panel meter read 400 scfm with fluctuations of ± 3.5 percent during the testing period.

The small size of the sampling ports precluded the proper measurement of the velocity profile within this pipe. Nonetheless, measurements with a velocity probe returned readings ranging from 376 scfm to 845 scfm. These readings were considered to be less reliable than those indicated by the facility panel meter. Therefore, mass emissions calculations in this report are based on the facility's flow meter readings.

Direct measurement with thermocouples showed the LFG temperature to be 54 °F.

4.1.2 Raw Landfill Gas (LFG) Constituents

The concentrations of the constituents of interest in the LFG are presented in Subsections 4.1.2.1 through 4.1.2.5. Following the presentation of the constituent concentrations, Section 4.3 summarizes the data and presents a comparison with the AP-42 values. Section 4.3 also presents the estimated mass flow rates of the constituents at the LFG pipe.

4.1.2.1 Volatile Organic Compounds (VOCs)

Concentrations of VOCs were obtained collecting summa canister samples using Method 40 procedures. Analysis was performed by Method TO-15, with gas

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chromatography and mass spectrometry (GC/MS). The alkanes (C2 through C6), being present in much higher concentrations, were analyzed by GC flame ionization detection (FID) on the same summa canister samples.

The data from the testing on May 15 and 16, 2004 were not useable because the results suggested that the samples were not collected properly. The analyte concentrations were extremely low and could not possibly be representative of the raw LFG. Collection of samples to replace the defective samples was repeated on September 14, 2004. Analytical results of the September 14 samples are reported below in Table 4-1.

Table 4-1. Raw Landfill Gas VOC Concentrations

Compound	Unit	MDL	Concentration (ppmv)			
			Run 1	Run 2	Run 3	Average ^a
<u>By GC/FID</u>						
Ethane	ppmv	1	5.9	5.5	5.4	5.6
Propane	ppmv	1	31.5	29.5	30.5	30.5
Butane	ppmv	1	ND	ND	ND	ND
Pentane	ppmv	1	ND	6.1	ND	2.4
Hexane	ppmv	1	3.9	3.0	ND	2.5
<u>By TO-15 GC/MS</u>						
Dichlorodifluoromethane (Freon 12) ^c	ppbv	0.3	1310	1200	1190	1240
1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	ppbv	0.2	115	116	99	110
Chloromethane	ppbv	0.1	695	ND	ND	232
Vinyl chloride ^c	ppbv	0.2	1240	1280	1080	1200
1,3-Butadiene ((Vinylethylene) ^c	ppbv	0.3	340	347	292	326
Bromomethane (Methyl Bromide)	ppbv	0.2	8	ND	ND	2.8
Chloroethane (Ethyl Chloride) ^c	ppbv	0.2	608	608	687	634
Trichloromonofluoromethane (CFC11)	ppbv	0.2	127	118	104	116
1,1-Dichloroethene	ppbv	0.2	20	23	21	21

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Compound	Unit	MDL	Concentration (ppmv)			
			Run 1	Run 2	Run 3	Average ^a
1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	ppbv	0.2	18	19	19	19
Carbon Disulfide	ppbv	0.3	80	110	88	93
Ethanol ^c	ppbv	0.2	384	438	359	394
Isopropyl Alcohol (2-Propanol) ^c	ppbv	0.2	6920	6260	6710	6630
Methylene chloride (Dichloromethane) ^c	ppbv	0.1	1140	1200	990	1110
Acetone ^c	ppbv	0.3	11900	14600	12000	12800
t-1,2-dichloroethene	ppbv	0.3	60	53	47	53
Hexane ^c	ppbv	0.3	4060	4310	3570	3980
Methyl-t-butyl ether (MTBE)	ppbv	0.3	45	46	26	39
1,1-Dichloroethane	ppbv	0.4	620	575	579	591
Vinyl Acetate ^c	ppbv	0.5	45	50	37	44
cis-1,2-Dichloroethene ^c	ppbv	0.3	1830	1850	1650	1780
Cyclohexane ^c	ppbv	0.3	2400	2320	2090	2270
Chloroform ^c	ppbv	0.3	430	470	555	485
Ethyl Acetate ^c	ppbv	0.3	4880	4760	4170	4600
Carbon Tetrachloride	ppbv	0.5	ND	114	ND	38
Tetrahydrofuran (Diethylene Oxide) ^c	ppbv	0.4	2140	2250	1800	2060
1,1,1-Trichloroethane	ppbv	0.3	ND	ND	ND	ND
2-Butanone (Methyl Ethyl Ketone) ^c	ppbv	0.3	8320	8860	7040	8070
Heptane ^c	ppbv	0.2	3730	3730	3280	3580
Benzene ^c	ppbv	0.2	1220	1270	1120	1200
1,2-Dichloroethane	ppbv	0.3	23	24	20	22

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Compound	Unit	MDL	Concentration (ppmv)			
			Run 1	Run 2	Run 3	Average ^a
Trichloroethylene (Trichloroethene)	ppbv	0.2	422	436	397	418
1,2-Dichloropropane	ppbv	0.3	ND	ND	ND	ND
Bromodichloromethane	ppbv	0.2	ND	ND	ND	ND
1,4-Dioxane (1,4-Diethylene Dioxide)	ppbv	0.2	0.3	23	14	12
cis-1,3-Dichloropropene	ppbv	0.2	7	4	ND	4
Toluene (Methyl Benzene)	ppbv	0.3	34000	37300	19500	30300
4-Methyl-2-pentanone (MIBK)	ppbv	0.2	ND	ND	ND	ND
t-1,3-Dichloropropene	ppbv	0.2	25	ND	ND	8
Tetrachloroethylene (Perchloroethylene) ^c	ppbv	0.3	1030	1070	963	1020
1,1,2-Trichloroethane ^c	ppbv	0.2	ND	ND	ND	ND
Dibromochloromethane	ppbv	0.2	11	21	15	16
1,2-Dibromoethane (Ethylene dibromide)	ppbv	0.2	ND	ND	ND	ND
2-Hexanone (Methyl Butyl Ketone)	ppbv	0.2	ND	ND	ND	ND
Ethylbenzene ^c	ppbv	0.3	8290	8620	7460	8120
Chlorobenzene ^c	ppbv	0.2	ND	62	ND	21
m/p-Xylene (Dimethyl Benzene) ^c	ppbv	0.65	13800	14700	12400	13600
o-Xylene (Dimethyl Benzene) ^c	ppbv	0.3	5490	5670	5060	5410
Styrene (Vinylbenzene) ^c	ppbv	0.1	1120	1320	1090	1180
Tribromomethane (Bromoform)	ppbv	0.3	ND	3	25	9
1,1,2,2-Tetrachloroethane	ppbv	0.2	ND	ND	ND	ND
1-Ethyl-4-methylbenzene (4-Ethyl Toluene) ^{b, c}	ppbv	0.2	1000 J	1010 J	913 J	976 J
1,3,5-Trimethylbenzene ^{b, c}	ppbv	0.2	1000 J	1010 J	913 J	976 J

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Compound	Unit	MDL	Concentration (ppmv)			
			Run 1	Run 2	Run 3	Average ^a
1,2,4-Trimethylbenzene ^c	ppbv	0.3	2230	2290	2040	2190
1,4-Dichlorobenzene ^c	ppbv	0.3	707	683	669	686
1,3-Dichlorobenzene ^c	ppbv	0.2	671	647	631	650
Benzyl Chloride ^c	ppbv	0.2	ND	ND	ND	ND
1,2-Dichlorobenzene ^c	ppbv	0.3	33	31	29	31
1,1,2,3,4,4-Hexachloro-1,3-butadiene	ppbv	0.2	ND	ND	ND	ND
1,2,4-Trichlorobenzene	ppbv	0.3	ND	ND	ND	ND
Acrylonitrile	ppbv	20	ND	ND	ND	ND

ND - Constituent not detected at the stated detection limits

^a - In computing averages, when all measurements are ND, the average is reported as ND. When one or more measurement is above detection, the ND measurement is treated as 50% of the stated MDL. If MDL is not reported, a ND measurement is treated as zero.

^b - 1-Ethyl-4-methylbenzene (4-Ethyl Toluene) and 1,3,5-Trimethylbenzene co-eluted from the GC and also have the same quantitation ions, thus making them indistinguishable. Therefore, the reported values represent the combined concentrations of these two compounds.

^c Analyte detected in blank sample. See table 5-2 for analyte-specific detected levels.

4.1.2.2 Non-methane Organic Compounds (NMOCs)

Non-methane organic compounds (NMOCs) in the raw LFG were analyzed by Method 25C on the samples collected by Method 40. Table 4-2 shows the concentrations of NMOC, methane (CH₄), CO₂ and O₂ in the LFG. These results were obtained from the samples that were collected during the retest that took place on September 14, 2004.

The analytes, oxygen (O₂), carbon dioxide (CO₂), and moisture, are not pollutants but are of interest as they are useful indicators of the “quality” of the raw LFG. The concentrations of nitrogen (N₂) and O₂ are also indicators of the extent of ambient air infiltration into the LFG collection. Method 25C for NMOC determination specifically recommends that these measurements be made to determine potential air infiltration. Therefore, while measurements for methane (CH₄), CO₂, O₂, and N₂ by Method 3C were not included in the original QAPP, these measurements were included and performed.

Table 4-2. Raw Landfill Gas Non-Methane Organic Compound (NMOC) Concentrations

	NMOC (as ppmv hexane)	CH ₄ (% v/v)		CO ₂ (% v/v)		O ₂ (% v/v)	N ₂ (% v/v)	Moisture (% v/v)
	Method 25C	Method 25C	Method 3C	Method 25C	Method 3C	Method 3C	Method 3C	Method 23
Run 1	971	58.9	55.6	41.1	38.5	0.02	11.4	NM
Run 2	1024	57.4	54.3	40.2	37.6	0.02	12.8	NM
Run 3	1024	59.5	55.5	41.7	38.3	0.01	9.5	NM
Average	1006	58.6	55.1	41.0	38.1	0.02	11.2	NM

NM – not measured because Method 23 sampling train was not run. Data column is included to retain format consistency with reports for Landfills A, B, and C

Concentrations are reported without correction for nitrogen

4.1.2.3 Hydrogen Sulfide (H₂S)

Raw landfill gas H₂S concentrations were obtained by collecting and analyzing the samples in accordance with EPA Method 11. These results are presented in Table 4-3.

Table 4-3. Raw Landfill Gas Hydrogen Sulfide Concentrations

	H ₂ S Concentration	
	(mg/m ³)	(ppmv)
Run 1	32.1	22.7
Run 2	90.2	63.9
Run 3	186	132
Average	103	72.7

Sample hold times exceeded the 30-day criteria by 2 days

4.1.2.4 Carbonyls

The target carbonyl compounds, formaldehyde and acetaldehyde, were analyzed by SW-846 Method 8315 on samples collected by EPA Method 0100. The analysis results are presented in Table 4-4.

Table 4-4. Raw Landfill Gas Carbonyls Concentrations

	Formaldehyde		Acetaldehyde	
	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)
MDL	8.0	6.4	8.3	4.5
Run 1	39.0	31.5	439	241
Run 2	19.9	16.0	534	293
Run 3	16.0	12.9	72	39
Average	25.0	20.1	348	191

4.1.2.5 Mercury (Hg)

Mercury (Hg) can exist in several forms. This test program focused on the elemental, monomethyl, and dimethyl forms of Hg, and total Hg. Elemental Hg was measured with the LUMEX instrument. Organic monomethyl Hg, dimethyl Hg and total Hg were sampled and analyzed using the organic mercury method.

4.1.2.5.1 Total Mercury (Hg) Samples

To collect the total Hg samples, an iodated charcoal trap was used as a sorbent. A backup tube was also present to assess any breakthrough. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull the sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-5 presents the total Hg concentrations in the LFG. They ranged from 723 to 751 ng/m^3 with an average of 740 ng/m^3 .

Table 4-5. Raw Landfill Gas Total Mercury Concentrations

	Total Mercury Concentration	
	(ng/m^3)	($\times 10^{-6}$ ppm)
MDL	50	6.0
Run 1	747	89.9
Run 2	723	87.0
Run 3	751	90.4
Average	740	89.1

4.1.2.5.2 Dimethyl Mercury (Hg) Samples

To collect the dimethyl Hg sample, a Carbotrap was used as a sorbent. A backup tube was also present to assess any breakthrough. A third iodated carbon trap was also present to collect any elemental Hg present. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

Table 4-6 presents the dimethyl Hg concentrations in the LFG. These ranged from 49.7 to 53.1 ng/m³ with an average of 51.0 ng/m³.

Table 4-6. Raw Landfill Gas Dimethyl Mercury Concentrations

	Dimethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.5	0.05
Run 1	50.3	5.3
Run 2	49.7	5.2
Run 3	53.1	5.6
Average	51.0	5.3

4.1.2.5.3 Monomethyl Mercury (Hg) Samples

To collect the sample, a set of three impingers filled with 0.001 M HCl was used to collect the monomethyl Hg. An empty fourth impinger was used to knockout any impinger solution carryover to the pump and meter system. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter capable of measuring the volume in 10 ml increments was used to monitor and quantify the volume of gas sampled.

As shown in Table 4-7, monomethyl Hg concentrations in the LFG ranged from 2.36 to 2.64 ng/m³ with an average amount of 2.47 ng/m³.

Table 4-7. Raw Landfill Gas Monomethyl Mercury Concentrations

	Monomethyl Mercury Concentration	
	(ng/m ³)	(x10 ⁻⁶ ppmv)
MDL	0.13	0.014
Run 1	2.40	0.27
Run 2	2.64	0.296
Run 3	2.36	0.264
Average	2.47	0.278

4.1.2.5.4 Elemental Mercury (Hg)

Elemental Hg was determined by the LUMEX instrument and the results are presented in Table 4-8. The analyzed concentrations ranged from 265 to 290 ng/m³ with an average of 278 ng/m³. Each reported run consisted of an instrument reading over a 30-second period.

Table 4-8. Raw Landfill Gas Elemental Mercury Concentrations

	Concentration ^a			
	Background		Gas Pipe	
	(ng/m ³)	(x10 ⁻⁶ ppmv)	(ng/m ³)	(x10 ⁻⁶ ppmv)
Run 1	0	0	265	31.9
Run 2	0	0	280	33.7
Run 3	0	0	290	34.9
Average	0	0	278	33.5

^a Average of three readings, each 30-second in duration

4.2 Enclosed Flare Stack Results

The enclosed flare stack was sampled for NMOCs (as THC_s), HCl, metals (Pb, As, Cd, Cr, Mn, Ni, total Hg), SO₂, NO_x, CO, CO₂, and O₂. The stack cross section was divided into 24 equal areas according to EPA Method 1. Sampling run time for HCl and metals was 60 minutes. Run time for CEMS parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) was 60 minutes.

4.2.1 Flare Stack Gas Flow Rate and Temperature

Sampling at the flare stack was conducted at isokinetic conditions. The procedures provided stack gas velocity distribution across the flare stack and reliable measurements of stack gas flow rates. Table 4-9 lists the volumetric flow rates and temperatures at the flare stack measured during the various sampling runs.

Table 4-9. Flare Stack Gas Operating Conditions Measured During Sampling

Run Number	Duration	Average Stack Temp (°F)	Carbon Dioxide (%)	Oxygen (%)	Moisture (%)	Velocity (actual ft/sec)	Vol. Flow Rate (acfm)	Vol. Flow Rate (dscfm)
D-Post-M26A-051604-01	10:35 - 11:38	1412	6.4	13.5	10.3	18.1	30700	7830
D-Post-M26A-051604-02	13:03 - 14:05	1446	6.3	13.5	7.9	19.0	32200	8290
D-Post-M26A-051604-03	15:00 - 16:02	1446	6.4	13.5	7.9	19.0	32200	8290
D-Post-M29-051604-01	10:34 - 11:38	1430	6.4	13.5	8.3	17.9	30400	7850
D-Post-M29-051604-02	13:02 - 14:05	1444	6.3	13.5	8.0	19.0	32200	8290
D-Post-M29-051604-03	14:59 - 16:04	1445	6.4	13.5	8.1	18.2	30900	7930
Average		1437	6.4	13.5	8.4	18.5	31400	8080

Flare stack cross-section flow area is 28.27 sq. ft.

4.2.2 Flare Stack Gas Constituents

The concentrations of the constituents of interest in the flare stack are presented in Subsections 4.2.2.1 through 4.2.2.7.

4.2.2.1 Flare Stack Oxygen (O₂) and Carbon Dioxide (CO₂)

Oxygen (O₂) and CO₂ concentrations provide an overall indication of the combustion process. Figure 4-1 shows the O₂ and CO₂ concentrations measured by the CEMs during the tests. The plotted data do not include the CEM responses to the instrument zeroing and calibration periods. Table 4-10 presents the daily averages of O₂ and CO₂ concentrations.

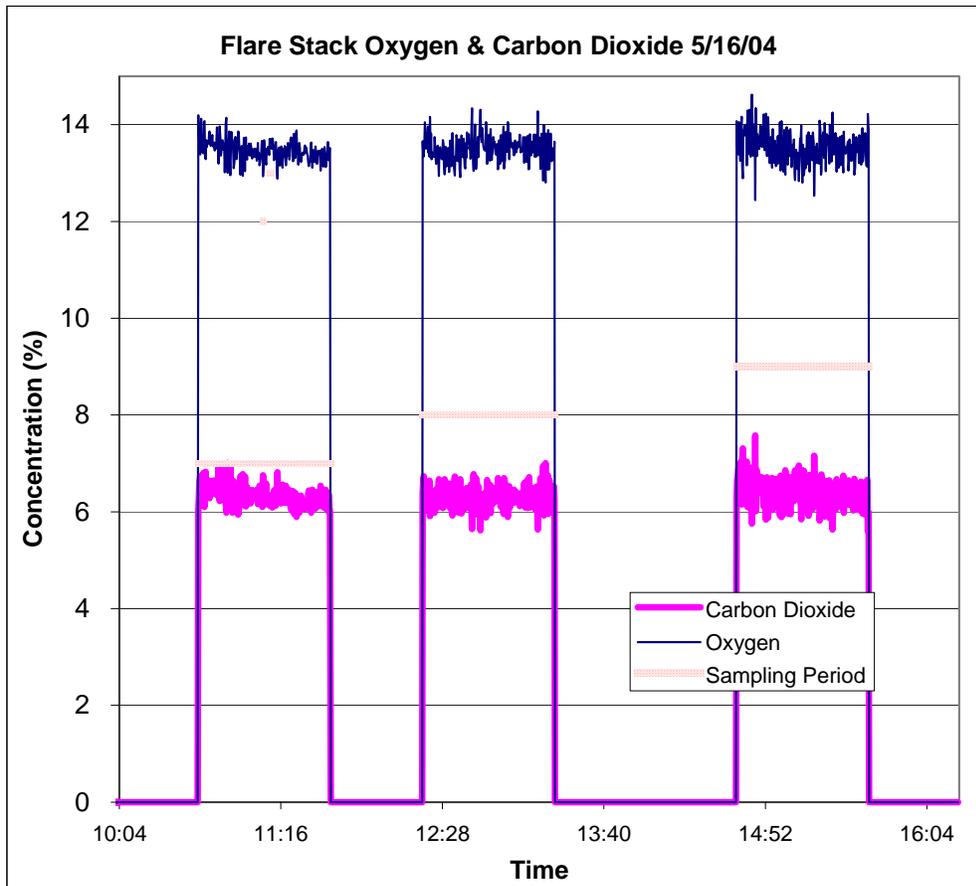


Figure 4-1. Engine Stack Oxygen and Carbon Dioxide Concentrations

Table 4-10. Flare Stack Combustion Products Concentrations

	O ₂ (% v)	CO ₂ (% v)
Run 1	13.5	6.4
Run 2	13.5	6.3
Run 3	13.5	6.4
Average	13.5	6.4

4.2.2.2 Flare Stack Total Hydrocarbon (THC) Concentrations

Flare stack THC emissions were measured by EPA Method 25A, which used a CEM. At the flare stack, hydrocarbon (including NMOCs) concentrations were found to be below 50 ppmv. The low concentrations rendered Method 25C, the method designed specifically for NMOC measurement, unsuitable to be applied at this location.

EPA Method 25A was used instead and produced concentrations of all hydrocarbons that respond to flame ionization detector (FID) analysis. The responding hydrocarbons were assumed to be NMOCs. Real-time continuous instrument responses are shown in Figure 4-2. The time-averaged concentrations are presented in Table 4-11. As can be seen, the instantaneous concentrations of total hydrocarbons ranged from 10 to over 175 ppmv, with time-averaged concentration of 17 ppmv as hexane.

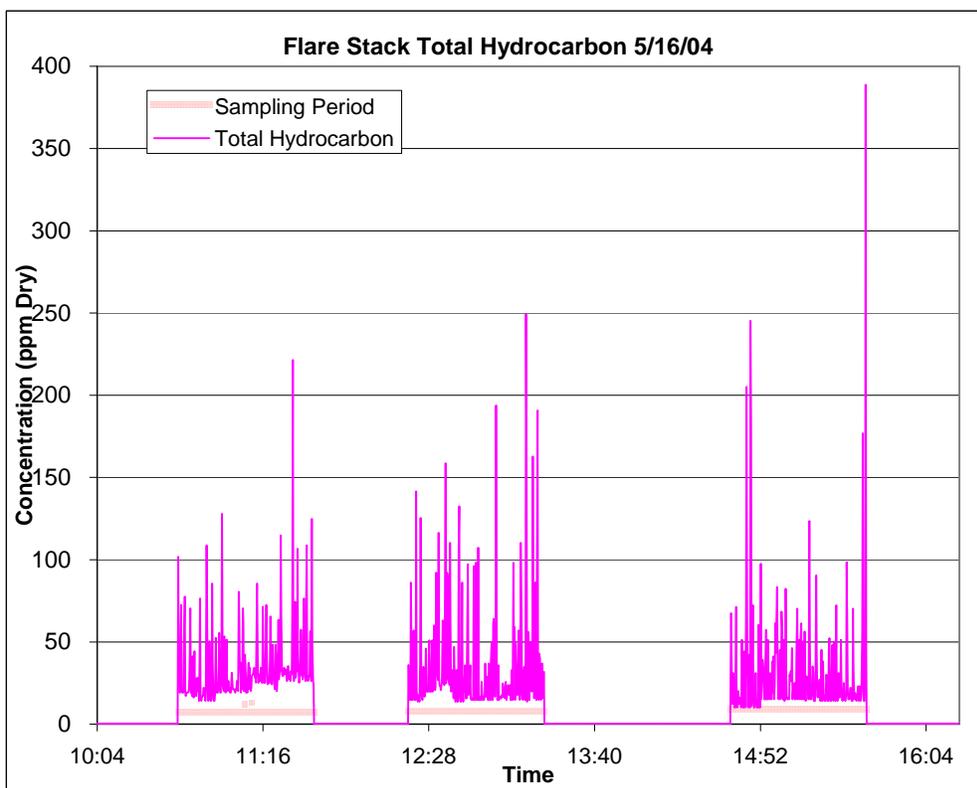


Figure 4-2. Flare Stack Total Hydrocarbon Concentrations

Table 4-11. Flare Stack THC Concentrations

	THC (ppmdv as propane)	THC (ppmdv as hexane)
Run 1	35.6	17.8
Run 2	35.5	17.8
Run 3	31.3	15.7
Average	34.1	17.1

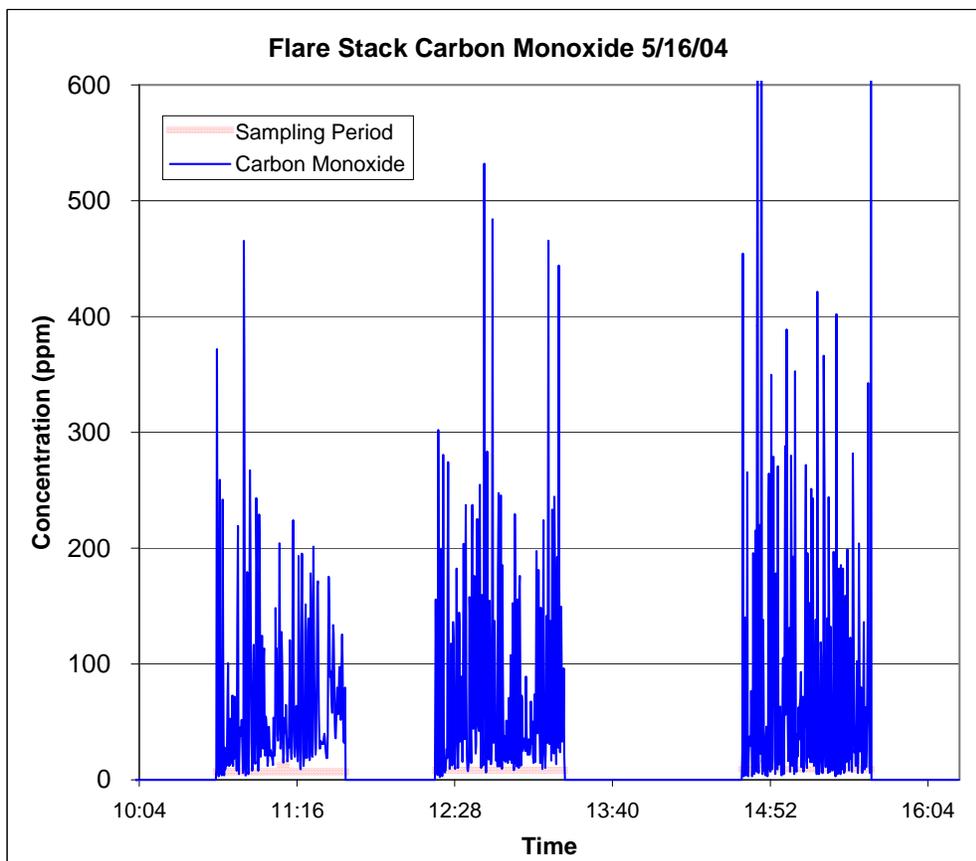


Figure 4-3. Flare Stack Carbon Monoxide Concentrations

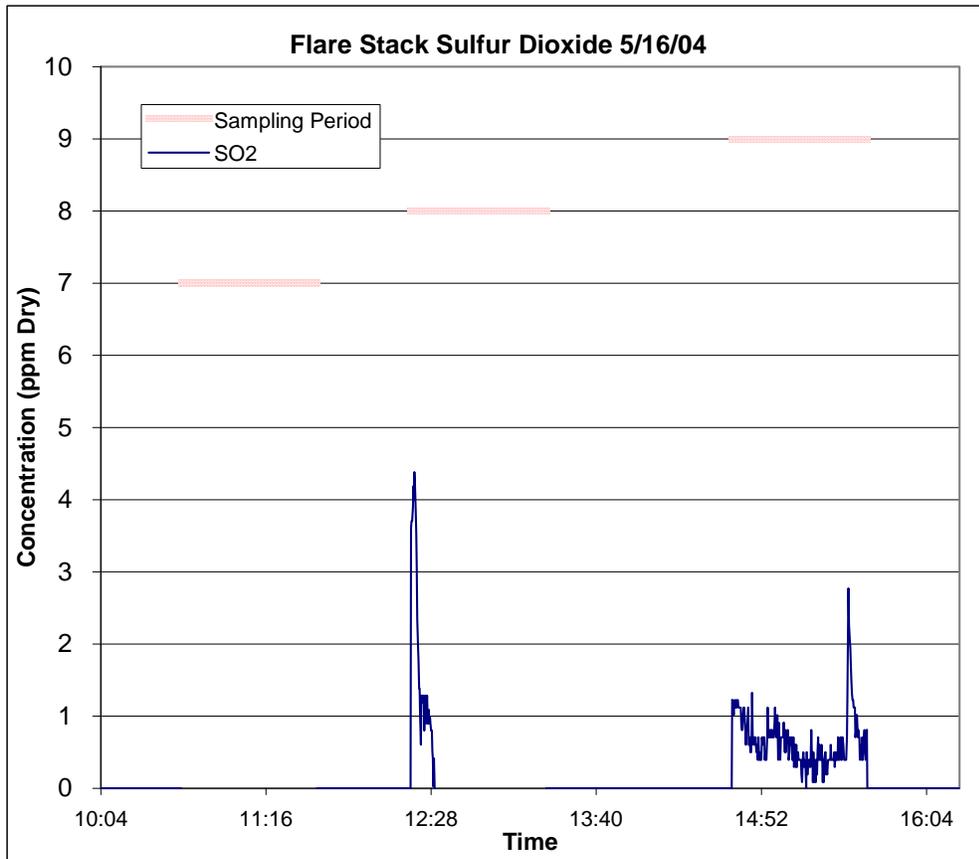


Figure 4-4. Flare Stack Sulfur Dioxide Concentrations

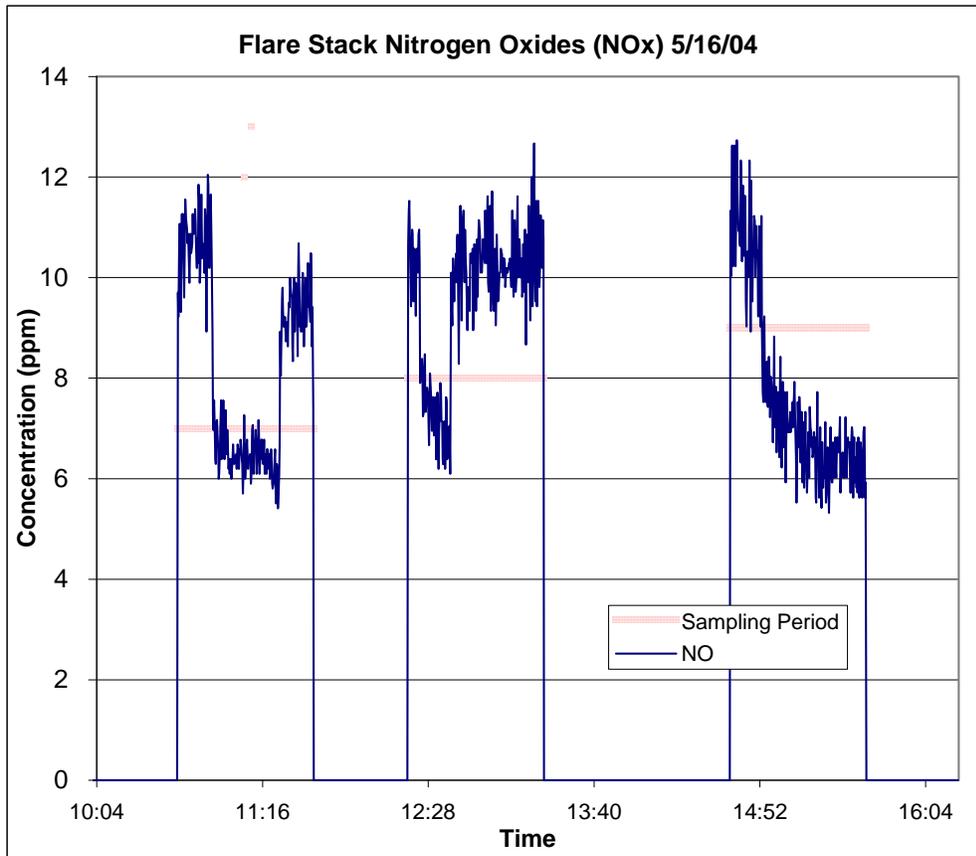


Figure 4-5. Flare Stack Nitrogen Oxides Concentrations

4.2.2.3 Flare Stack Hydrochloride (HCl) Emissions

Enclosed flare stack HCl emissions results are presented in Table 4-12.

Table 4-12. Flare Stack Hydrogen Chloride Emissions

	HCl Concentration		HCL Emission Rate	
	(ppmdv)	(mg/m ³)	(lb/hr)	(g/hr)
Run 1	1.3	2.0	0.06	27
Run 2	1.3	2.2	0.06	27
Run 3	1.3	2.2	0.06	27
Average	1.3	2.2	0.06	27

4.2.2.4 Flare Stack Metals Emissions

Flare stack metals emissions results are presented in Table 4-13. The metal concentrations were determined by Method 29, and included those for As, Cd, Cr, Pb, Mn, Hg (total) and Ni. Mercury (Hg) concentration (elemental) was separately measured by the LUMEX instrument and those results are also included in Table 4-16.

The “<” symbol denotes that the notated metal was not detected in that sample. The values following the “<” symbol represent the concentrations and emission rates that would have been the case had the metal been found at the method detection limit. Hence the values represent the upper limits of what might be present.

4.2.2.5 Flare Stack Gaseous Emissions: Carbon Monoxide (CO), Sulfur Dioxide (SO₂), and Nitrogen Oxides (NO_x)

Gaseous emissions measured with CEMS include CO₂, SO₂, O₂, and NO_x. These results are in Table 4-14. The detailed CEM measurement plots are shown in Figures 4-3 through 4-5.

4.3 Comparison with AP-42 Values

One of the major objectives of the test program was to expand on the database of LFG constituent compounds and their concentrations. If warranted, these data may contribute towards updating the AP-42 default values.

Table 4-15 presents the concentrations of LFG constituents to provide direct comparisons with AP-42 default values. Table 4-16 presents the concentration of other constituents targeted by the various analyses but are not listed in AP-42. An expanded discussion and comparison is included in the overall project report.

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Table 4-13. Flare Stack Metals Emissions

Analyte	C-POST-M29-051404-01			C-POST-M29-051404-02			C-POST-M29-051404-03			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(µg/dscm)	(g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(g/hr)	(x10 ⁻⁶ lb/hr)
Arsenic	5.0	0.067	150	4.4	0.063	138	4.7	0.064	141	4.7	0.065	142
Cadmium	0.174	0.002	5.1	0.262	0.004	8.1	0.191	0.003	5.7	0.209	0.003	6.3
Chromium	5.1	0.068	150	3.4	0.048	106	3.7	0.050	111	4.1	0.055	122
Lead	<0.833	<0.011	<25	<0.785	<0.011	<24.4	<0.817	<0.011	<24.3	ND	ND	ND
Manganese	2.2	0.030	65	1.2	0.017	39	20	0.273	603	7.9	0.107	236
Nickel	7.0	0.094	210	3.1	0.044	98	4.4	0.059	129	4.8	0.065	144
Mercury (Total by Method 29)	<2.1	<0.028	<61	<2.5	<0.035	<77	<2.6	<0.035	<77	ND	ND	ND
	RUN 1			RUN 2			RUN 3			Average		
Mercury (Elemental by LUMEX)	0.603	0.00821	18.1	0.886	0.0121	26.6	1.10	0.0152	33.5	0.867	0.0118	26.1

Table 4-14. Flare Stack CO, SO₂, NO_x Concentrations

	Concentration (ppmdv)		
	CO	SO ₂	NO _x (as NO) ^a
Run 1	69	0	8.2
Run 2	79	0	9.7
Run 3	92	0.7	7.7
Average	80	0.2	8.5

^a One of six drift checks was 3.3 percent and exceeded the ±3 percent criteria

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Table 4-15. Comparison of Raw Landfill Gas Constituent Concentrations with AP-42 Values

Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1,1,1-Trichloroethane	71-55-6	133.42	0.48	0.0003	ND	ND	ND	ND	ND
M-40	1,1,2,2-Tetrachloroethane	79-34-5	167.85	1.11	0.0002	ND	ND	ND	ND	ND
M-40	1,1-Dichloroethane (Ethylidene Dichloride)	75-34-3	98.96	2.35	0.0004	0.591	151	2420	1650	3.6
M-40	1,1-Dichloroethene	75-35-4	96.94	0.20	0.0002	0.021	5.3	85.6	58.2	0.128
M-40	1,2-Dichloroethane	107-06-2	98.96	0.41	0.0003	0.022	5.7	91.5	62.2	0.137
M-40	1,2-Dichloropropane	78-87-5	112.98	0.18	0.0003	ND	ND	ND	ND	ND
M-40	Isopropyl alcohol (2-Propanol)	67-63-0	60.11	50.10	0.0002	6.63	1000	16500	11200	24.7
M-40	Acetone	67-64-1	58.08	7.01	0.0003	12.8	1900	30800	21000	46.2
M-40	Acrylonitrile	107-13-1	53.06	6.33	0.00002	ND	ND	ND	ND	ND
M-40	Bromodichloromethane	75-27-4	163.83	3.13	0.0002	ND	ND	ND	ND	ND
M-40	Butane	106-97-8	58.12	5.03	1	ND	ND	ND	ND	ND
M-40	Carbon Disulfide	75-15-0	76.13	0.58	0.0003	0.093	18.2	292	199	0.438
No Test	Carbon Monoxide	630-08-0	28.01	141		NM	NM	NM	NM	NM
M-40	Carbon Tetrachloride	56-23-5	153.84	0.004	0.0005	0.038	15.1	242	165	0.363
No Test	Carbonyl Sulfide (Carbon oxydisulfide)	463-58-1	60.07	0.49		NM	NM	NM	NM	NM
M-40	Chlorobenzene	108-90-7	112.56	0.25	0.0002	0.021	6.0	96	66	0.15
M-40	Chlorodifluoromethane (Freon 22)	75-45-6	86.47	1.30		NM	NM	NM	NM	NM
M-40	Chloroethane (Ethyl Chloride)	75-00-3	64.52	1.25	0.0002	0.63	106	1700	1150	2.5

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	Chloroform	67-66-3	119.39	0.03	0.0003	0.485	150	2400	1630	3.6
M-40	Chloromethane	74-87-3	50.49	1.21	0.0001	0.232	30.3	485	330	0.727
M-40	1,4-Dichlorobenzene	106-46-7	147.00	0.21	0.0003	0.686	261	4180	2840	6.3
M-40	1,3-Dichlorobenzene	541-73-1	147.00	0.21	0.0002	0.650	247	3950	2690	5.9
M-40	1,2-Dichlorobenzene	95-50-1	147.01	0.21	0.0003	0.031	11.8	189	128	0.283
M-40	Dichlorodifluoromethane (Freon 21)	75-71-8	120.91	15.70	0.0003	1.24	386	6180	4200	9.3
M-40	Dichlorofluoromethane (Freon 12)	75-43-4	102.92	2.62		NM	NM	NM	NM	NM
M-40	Methylene Chloride (Dichloromethane)	75-09-2	84.94	14.30	0.0001	1.11	243	3900	2650	5.8
No Test	Dimethyl Sulfide (Methyl sulfide)	75-18-3	62.13	7.82		NM	NM	NM	NM	NM
M-40	Ethane	74-84-0	30.07	889	1	5.6	435	6970	4740	10.4
M-40	Ethanol	64-17-5	46.08	27.20	0.0002	0.394	46.9	751	511	1.1
No Test	Ethyl Mercaptan (Ethanediol)	75-08-1	62.13	2.28		NM	NM	NM	NM	NM
M-40	Ethylbenzene	100-41-4	106.16	4.61	0.0003	8.12	2200	35700	24300	53.5
M-40	1,2-Dibromoethane (Ethylene dibromide)	106-93-4	187.88	0.001	0.0002	ND	ND	ND	ND	ND
M-40	Trichloromonofluoromethane (Fluorotrichloromethane) (F11)	75-69-4	137.38	0.76	0.0002	0.116	41.3	662	450	0.992
M-40	Hexane	110-54-3	86.18	6.57	0.0003	2.47	550	8810	5990	13.2
M-11	Hydrogen Sulfide	7783-06-4	34.08	35.50		72.7	6400	103000	69700	154

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10-9 lb/ft3)	(µg/m3)	(mg/hr)	(x10-3 lb/hr)
Linberg	Mercury (Dimethyl)		230.66	Not Listed	0.05E-06	5.3E-06	0.0032	0.052	0.035	0.0000768
LUMEX	Mercury (Elemental)	7439-97-6	200.61	Not Listed		33.5E-06	0.0174	0.278	0.189	0.000417
Linberg	Mercury (Monomethyl)		215.62	Not Listed	0.014E-06	278E-06	0.154	2.47	1.68	0.0037
Linberg	Mercury (Total)		215.63	253.0E-6	6E-06	89.1E-06	49.7	796	541	1.19
M-40	2-Butanone (Methyl Ethyl Ketone)	78-93-3	72.10	7.09	0.0003	8.07	1500	24100	16400	36.1
M-40	2-Hexanone (Methyl Butyl Ketone)	591-78-6	100.16	1.87	0.0002	ND	ND	ND	ND	ND
No Test	Methyl Mercaptan (Methanethiol)	74-93-1	48.11	2.49		NM	NM	NM	NM	NM
M-40	Pentane	109-66-0	72.15	3.29	1	2.37	442	7080	4820	10.6
M-40	Tetrachloroethylene (Perchloroethylene)	127-18-4	165.83	3.73	0.0003	1.02	438	7004	4760	10.5
M-40	Propane	74-98-6	44.09	11.10	1	30.5	3500	55700	37800	83.4
M-40	t-1,2-Dichloroethene	156-60-5	96.94	2.84	0.0003	0.053	13.4	214	146	0.321
M-40	Trichloroethylene (Trichloroethene)	79-01-6	131.38	2.82	0.0002	0.418	142	2280	1550	3.4
M-40	Vinyl Chloride	75-01-4	62.50	7.34	0.0002	1.20	194	3100	2110	4.6
M-40	m/p-Xylene (Dimethyl Benzene)	1330-20-7	106.16	12.10	0.00065	13.7	3800	60100	40800	90.0
M-40	o-Xylene (Dimethyl Benzene)	95-47-6	106.16	12.10	0.0003	5.41	1500	23800	16100	35.6

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	Benzene (Co-disposal)	71-43-2	78.11	11.10	0.0002	1.20	243	3890	2600	5.8
M-40	Benzene (No-disposal or Unknown)	71-43-2	78.11	1.91	0.0002	1.20	243	3890	2600	5.8
M-25C	NMOC as Hexane (Co-disposal)		86.17	2420.00		668	149000	2380000	1620000	3600
M-25C	NMOC as Hexane (No-codisposal or Unknown)			595.00		668	149000	2380000	1620000	3600
M-40	Toluene (Methyl Benzen) (Co-disposal)	108-88-3	92.13	165.00	0.0003	30.3	7200	116000	78500	173
M-40	Toluene (Methyl Benzene) (No or Unknown)			39.30	0.0003	30.3	7200	116000	78500	173

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Table 4-16. Raw Landfill Gas Constituent Concentrations for Compounds without AP-42 Default Values

Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-0100	Acetaldehyde	75-07-0	44.05	0.0045	0.191	21.7	348	237	0.522
M-0100	Formaldehyde	50-00-0	30.03	0.0064	0.020	1.6	25	17	0.0375
M-23	Dioxins/Furans				NM	NM	NM	NM	NM
M-23	PAHs				NM	NM	NM	NM	NM
M-25C	Carbon Dioxide	124-38-9	44.01		381333	43400000	695000000	472000000	1.0
M-25C	Methane	74-82-8	16.04		551333	22900000	366000000	249000000	549000
M-25C	Oxygen	7782-44-7	32.00		16667	1400000	22100000	15000000	33100
M-40	1,1,2,3,4,4-Hexachloro-1,3-butadiene	87-68-3	260.76	0.0002	ND	ND	ND	ND	ND
M-40	1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	76-13-1	187.38	0.0002	0.019	9.0	145	98.4	0.217
M-40	1,1,2-Trichloroethane	79-00-5	133.42	0.0002	ND	ND	ND	ND	ND
M-40	1,2,4-Trichlorobenzene	120-82-1	181.46	0.0003	ND	ND	ND	ND	ND
M-40	1,2,4-Trimethylbenzene	95-63-6	120.19	0.0003	2.187	680	10900	7400	16.3
M-40	1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	76-14-2	170.92	0.0002	0.110	48.6	778	529	1.2
M-40	1,3,5-Trimethylbenzene	108-67-8	120.19	0.0002	0.976	303	4860	3300	7.3
M-40	1,3-Butadiene (Vinylethylene)	106-99-0	54.09	0.0003	0.326	45.6	731	497	1.1
M-40	1,4-Dioxane (1,4-Diethylene Dioxide)	123-91-1	88.10	0.0002	0.013	3.0	48.2	32.7	0.0721
M-40	1-Ethyl-4-methylbenzene (4-Ethyl Toluene)	622-96-8	120.20	0.0002	0.976	303	4860	3300	7.3
M-40	4-Methyl-2-pentanone (MIBK)	108-10-1	100.16	0.0002	ND	ND	ND	ND	ND
M-40	Benzyl Chloride (Chloromethyl Benzene)	100-44-7	126.58	0.0002	ND	ND	ND	ND	ND
M-40	Bromomethane (Methyl bromide)	74-83-9	94.95	0.0002	0.0027	0.67	11	7.3	0.0161
M-40	cis-1,2-Dichloroethene	156-59-2	96.94	0.0003	1.78	446	7140	4850	10.7

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Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	cis-1,3-Dichloropropene	10061-01-5	110.98	0.0002	0.0037	1.1	17	12	0.026
M-40	Cyclohexane	110-82-7	84.16	0.0003	2.268	494	7910	5370	11.8
M-40	Dibromochloromethane	124-48-1	208.29	0.0002	0.0155	8.3	134	91	0.20
M-40	Ethyl Acetate	141-78-6	88.10	0.0003	4.60	1000	16800	11400	25.2
M-40	Heptane	142-82-5	100.20	0.0002	3.58	927	14900	10100	22.3
M-40	Methyl-t-butyl Ether (MTBE)	1634-04-4	88.15	0.0003	0.039	8.9	142	97	0.213
M-40	Styrene (Vinylbenzene)	100-42-5	104.14	0.0001	1.177	317	5070	3450	7.6
M-40	t-1,3-Dichloropropene	1006-02-6	110.98	0.0002	0.0084	2.4	39	26.2	0.058
M-40	Tetrahydrofuran (Diethylene Oxide)	109-99-9	72.10	0.0004	2.06	385	6160	4190	9.2
M-40	Tribromomethane (Bromoform)	75-25-2	252.77	0.0003	0.0094	6.1	98	67	0.147
M-40	Vinyl Acetate	108-05-4	86.09	0.0005	0.044	9.8	157	107	0.235

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5. Quality Assurance/Quality Control (QA/QC)

This project produced data that qualified to receive the “A” rating with respect to the rating system described in section 4.4.2 of the *Procedures for preparing Emission Factor Documents* (EPA-454/R-95-015). The cited EPA document provides a clear description of the requirements for an “A” data quality rating. Tests were performed by using an EPA reference test method, or when not applicable, a sound methodology. Tests were reported in enough detail for adequate validation and raw data were provided that could be used to duplicate the emission results presented in this report.

Throughout the results sections of this report, notations and footnotes were included to flag data that, for various reasons, did not meet their associated measurement quality objectives.

5.1 Assessment of Measurement Quality Objectives

Measurement quality objectives (MQOs) were established for each critical measurement and documented in the *Site-Specific QAPP for the Field Evaluation of Landfill Gas Control Technologies-Landfill D*. The following subsections assess MQOs for each measurement to determine if goals were achieved. When applicable, data validation elements performed on laboratory analytical reports are also included.

5.1.1 Continuous Emissions Monitors (CEMs)

Oxygen (O₂), CO/CO₂, SO₂ NO_x and THC were measured in the field using CEMs. The following MQOs were established for CEM measurements for Landfill D:

- Direct calibration bias: ±2 percent
- System bias checks: ±5 percent
- Zero and drift: ±3 percent
- Completeness: >90 percent

Direct calibrations were performed daily, prior to testing, at zero, and a minimum of two other concentrations (typically a mid-level concentration and one point towards the end of the instrument range). System bias checks were performed pre-test and post-test. Drift checks were performed daily, post-test. Table 5-1 summarizes these QC checks

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for all instruments. All MQOs were met for all CEM measurements except the TECO THC monitor drift checks. One of the six measurements fell slightly outside of the ± 3.0 percent acceptance criteria at 3.3 percent, which dropped completeness to 83 percent, below the 90 percent MQO. This was not considered a major failure. Limitation on data use was not necessary. Nonetheless, the results in Table 4-14 were notated to reflect this deviation.

Table 5-1. CEM MQO Summary for Landfill D

Instrument and Range	Direct Calibration ($\pm 2\%$ criteria)			System Bias Checks ($\pm 5\%$ criteria)			Drift Checks ($\pm 3\%$ criteria)		
	Total #	Bias Range	Complete %	Total #	Bias Range	Complete %	Total #	Bias Range	Complete %
Servomex O ₂ Analyzer (0-21%)	9	0.1-0.5%	100	12	0-1.1.2%	100	6	0.3-0.7%	100
Cal Analytical CO ₂ Analyzer (0-20%)	9	0-2.0%	100	12	0.2-1.3%	100	6	0.1-0.6%	100
Cal Analytical CO Analyzer (0-650 ppm)	12	0.2-0.6%	100	12	0-1.4%	100	6	0-1.8%	100
Cal Analytical SO ₂ Analyzer (0-500 ppm)	9	0-0.7%	100	12	0.1-4.3%	100	6	0-2.1%	100
TECO THC Analyzer (0-1000 ppm)	NA ^a	NA ^a	NA ^a	18	0.2-1.5%	100	6	0-1.8%	100
TECO NO _x Analyzer (0-4000 ppm)	9	0.3-1.3%	100	12	0.2-3.2%	100	6	0-3.3	83 ^b

^a The method called for calibration gases to be introduced at a point of the sampling system close to the sampling probe for them to flow through the heated sample line. Calibration gases were not injected directly to the analyzer

^b One of the six measurements was above acceptance criteria.

5.1.2 Carbonyls (SW-846 Method 8315A)

The following MQOs were established in the QAPP for this method:

- Recovery (formaldehyde): 50-150 percent
- Completeness: >90 percent

Four samples (including one field blank) were submitted from Landfill D for formaldehyde and acetaldehyde determination to Resolution Analytics. Results were reported in RFA#RN990230. The report included information on instrument calibration and internal QC checks. Samples collected on May 16, 2004 were received by the laboratory on May 19, 2004 and analyzed on June 7, 2004. That met the 30-day hold-time limitation. Analytical detection limits were reported as 50 ppb for formaldehyde and 51.7 ppb for acetaldehyde in the extract. The extract volume was 5 ml. Therefore, the detectable quantities for formaldehyde and acetaldehyde were 250 ng and 258 ng, respectively. Based on a sample gas volume of about 31 liters (at standard condition), the corresponding MDLS for formaldehyde and acetaldehyde were 6.4 ppbv and 4.5 ppbv, respectively.

The field blank (LDFLD-M0100-051604-FB) did not have detectable levels of either compound. To assess accuracy, an external performance evaluation audit sample containing 1.25 ppm formaldehyde and acetaldehyde was analyzed with the sample set. Recovery was 101 percent for both compounds, which meets the 50-150 percent MQO established in the QAPP. This spike was analyzed in duplicate with a percent difference (%D) between injections of 4.8 percent. All project samples were injected in duplicate and the %D range for formaldehyde was 0 to 4.5 percent and for acetaldehyde was 0 to 3.6 percent. All MQOs were met for this method for a completeness of 100 percent.

5.1.3 Hydrogen Sulfide (H₂S) (EPA Method 11)

The following MQOs were established in the Landfill D QAPP for this method:

- Accuracy: ±5 percent bias
- Completeness: >90 percent

Five samples (including a field blank) plus reagent blanks were submitted to Oxford Laboratories for H₂S analysis by EPA Method 11, as part of the Landfill D field test effort. The samples were collected on May 15, 2004, submitted on May 27, 2004, and were analyzed on June 17, 2004, which exceeded the 30-day hold time criteria established in the QAPP by 2 days. The potential adverse effect of hold-time having been exceeded on the results is unknown. The test results in Table 4-3 were notated accordingly.

The field blank submitted did not have quantifiable concentrations of H₂S. One spike and one set of duplicates were also performed by the laboratory as additional QC checks. Spike recoveries were reported as 109 percent, which meets MQO. The duplication of sample LDFLC-PRE-M0011-51304-02 yielded a titration difference of only 0.3 ml. Although the computed sample concentration values showed greater than 10 percent difference, this was an acceptable duplicate. The final difference was because of the small titration difference between the sample and the blank.

5.1.4 Dioxins and Furans (PCDD/PCDFs) (EPA Method 23/0011)

The specification to conducting testing for these compounds was incorrectly retained in the Site-Specific QAPP for Landfill D. The high gas temperatures (>1400 °F) at the sampling location near the flare stack exit rendered the presence of dioxins and furans (PCDD/PCDFs) improbable. Extensive research data showed that formation of PCDD/PCDFs is favored within the temperature window between 500 and 700 °F. The flare system did not provide for the gases to be cooled to these temperatures before the gases were emitted into the atmosphere.

Furthermore, PCDD/PCDF test results showed that these targets were mostly non-detectable. The cost of this measurement, which would most likely return non-detect results, was not justified. Hence, consistent with the intent of this test program, PCDD/PCDF samples were not collected from Landfill D.

5.1.5 Polycyclic Aromatic Hydrocarbons (PAH) (EPA Method 23/0011)

Polycyclic aromatic hydrocarbon (PAH) samples were not collected for the same reason stated in Section 5.1.4.

5.1.6 Non-Methane Organic Compounds (NMOC) (Method 25C)

The following MQOs were established in the QAPP for Landfill D:

- Accuracy: ±5 percent bias
- Completeness: >90 percent

Four canister samples (including a field blank) were submitted from to Triangle Environmental Services for NMOC analysis by Method 25-C. The samples were collected on May 16, 2004, submitted on June 3, 2004, and analyzed June 7-22, 2004,

which met the 30 day hold time requirements. The laboratory report included information on instrument calibration and internal QC checks.

Non-methane organic compounds (NMOCs) in the field blank (LDFLD-PRE-M40-051604-FB) were below detection limit. Accuracy for the method was assessed by evaluating results of response factor (RF) check samples that were run prior to and following sample analysis. Acceptance criteria established by the method is that the RF must be within 20 percent of the RF from initial calibration. All RF checks were within 10 percent of the initial calibration, well within the acceptance criteria. The %D between the pre and post-test checks were less than 1 percent. Samples were run in triplicate and all percent relative standard deviation (RSD) for samples were <5 percent.

The data set was determined valid but there was a problem with the samples from the Landfill D site. All three of the gas pipe samples had nitrogen (N₂) and O₂ concentrations that exceeded the Method 25C criteria of 20 percent for N₂ and 5 percent for O₂. The NMOC data for these samples could not be used. Since three of the four samples could not be used, the completeness MQO for this measurement was 25 percent and did not meet the objective set in the QAPP.

5.1.7 Hydrogen Chloride (HCl) (EPA Method 26A)

The following MQOs were established in the QAPP for Landfill D:

- Accuracy: ±10 percent bias
- Completeness: >90 percent

Four samples (including one field blank) were submitted from Landfill D for HCl and chlorine (Cl₂) determination to Resolution Analytics. Results were reported in RFA#RN990230. The report included information on instrument calibration and internal QC checks. Samples were collected on May 16, 2004, received by the laboratory on May 19, 2004, and analyzed on June 7, 2004, which met the 4 week hold-time requirement. Analytical detection limits were reported as 2.6 ppm for HCl and 2.5 ppm for Cl₂.

The field blank (LDFLD-M26-051604-FB), submitted with samples, did not contain detectable levels of HCl or Cl₂. In-house audit samples were analyzed with each respective group of field samples and fell within method criteria of 10 percent of their

expected values. A matrix spike was performed on sample LDFLC-051404-3. An 0.8 ml sample was spiked with 0.8 ml of standard (50 ppm for HCl/25 ppm for Cl₂) and analyzed in triplicate. The laboratory reported 99 percent recovery of the HCl spike with a 0.4 percent RSD in triplicate injections, and 102 percent recovery of the Cl₂ spike with a 0.3 percent RSD. This met the MQO of ±10 percent with very good precision. In addition to the matrix spike, an internal QC check was performed after every 10 samples. All samples were measured in triplicate. Calculated bias for internal QC check was <1 percent for all measurements as was the %D between triplicates. All MQOs were met for 100 percent completeness.

5.1.8 Metals (EPA Method 29)

The following MQOs were established in the Landfill D QAPP for this method:

- Accuracy: ±25 percent bias
- Completeness: >90 percent

Four sets of Method 29 Multi-Metals trains (including one field blank) were submitted from Landfill D for As, Cd, Cr, Pb, Mn, Hg, and Ni determination to First Analytical Laboratories. Results were reported in Project #40513. The report included information on instrument calibration and internal QC checks. Samples were collected on May 16, 2004, received by the laboratory on May 19, 2004, and analyzed on May 24-26, 2004, which met the 14 day hold-time requirement. Method detection limits for each of the target metals were reported as follows:

- As = 5.0 µg/L
- Cd = 0.2 µg/L
- Cr = 5.0 µg/L
- Pb = 5.0 µg/L
- Mn = 5.0 µg/L
- Ni = 10 µg/L
- Hg = 0.2 µg/L

Traces of Cd, Cr, Mn, and Ni were found in the blanks, which is not unusual. Some of the back half Mn samples are abnormally high. This is a common problem which can occur in Method 29 if a tiny amount of the potassium permanganate reagent gets in to the hydrogen peroxide impingers.

All samples were spiked prior to analysis. The Cd back half spike recovery was poor (56 percent), so the Cd back half analysis was conducted by the method of standard additions to overcome the problem. All of the other spike recoveries were within the acceptable range of 75-125 percent. In addition to spiking the samples, for each metal, internal calibration verification samples (ICVs) and continuing calibration verification samples (CCVs) were performed. ICVs were run at the beginning of each run set and CCVs were run at a frequency of one for every 10 samples. The ICV and CCV measured values were all $\leq \pm 10$ percent for all metals with the exception of Ni. Two of the four CCV measurements for Ni were slightly above the 10 percent acceptance criteria at 10.6 percent and 14.0 percent. This was not considered a major failure and data limitations were not applied. To evaluate precision, all samples were analyzed in duplicate. Whenever %RSD for duplicate measurements exceeded 20 percent, the sample was re-analyzed.

5.1.9 Organo-Mercury (Hg) and Total Mercury (Hg) (Frontier)

The following MQOs were established in the Landfill D QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

For Hg samples, replicates and spikes were incorporated into the sampling scheme. In addition, performance evaluation audit samples were also submitted to Frontier for analysis. Results from the performance evaluation audit (PEA) are summarized in Section 5.2.2.2.

Four total Hg samples (including a field blank) were taken at Landfill D. Samples were collected on May 15, 2004, extracted on May 28, 2004, and analyzed on June 3, 2004. That analysis schedule exceeded the 14-day hold-time specified in the QAPP. All other quality assurance measures indicated that the analysis of the traps were under good control. All field blanks were consistent with historical values and indicated the detection limit was likely to be at or below the previous estimated value of 50ng/m^3 .

Spike recoveries were >95 percent and standard deviation between replicates was 169 percent, which met MQOs and were 100 percent complete.

Five monomethyl mercury (MMHg) samples (including a field blank) were collected at Landfill D on May 15, 2004. These samples were extracted on May 27, 2004 and analyzed on May 28, 2004 which meets the 14-day hold-time. Analysis of these samples was under good control with acceptable distillation spike recoveries and distillation duplicates. All CCV standards had acceptable recoveries. Spike recoveries were 80-117 percent, which meets MQOs. The RSD between replicates was <10 percent. For Landfill D, this analysis was 100 percent complete.

Six dimethyl mercury (DMHg) samples (including a field blank) were collected at Landfill D on May 15, 2004. These samples were extracted and analyzed on May 27, 2004, which met the 14-day hold-time. The analysis of samples was well within control, with acceptable recoveries as well as good linear control standards and second-source standard recoveries. Spike recovery for Landfill D samples was 78-80 percent and RSD between replicate samples was 3.6 percent. This meets MQOs established in the QAPP and DMHg analysis was therefore 100 percent complete.

The field blank was low indicating that the trap media, handling procedures, and analytical techniques did not contribute to the reported values. Field matrix spike recoveries ranged from 50-93 percent. The DMHg analysis was 100 percent complete.

5.1.10 Volatile Organic Compound (VOCs) and Methane (CH₄) (Method TO-15)

The following MQOs were established in the Landfill D QAPP for this method:

- Accuracy: 50-150 percent recovery
- Completeness: >90 percent

Five SUMMA canisters (including field blanks) were submitted from Landfill D to Research Triangle Park (RTP) Laboratories for VOC and CH₄ determination by EPA Method TO-15. Results were reported in Project #04-162. Samples were collected on September 14, 2004 and analyzed on October 4, 2004, which met the 30 day hold-time requirement.

Analysis of the field blank (LDFLD-091404-M40-FB) resulted in significant levels of several VOC compounds. Table 5-2 lists the compounds identified in the field blank

that were >1 ppbv. This should be considered when evaluating sample data. Accuracy was assessed using results of a 10 ppbv laboratory control sample containing all target compounds. For all but one compound, recoveries ranged from 75-135 percent, which met the established acceptance criteria of 50-150 percent. The recovery reported for m/p-xylene was 250 percent. Results for this compound should be flagged as estimated, “J”. Precision was demonstrated through multiple injections of standards at five concentration levels. The RSD between the calculated relative response factors (RRF) must be <30 percent with allowances that two may be >40 percent. The average RSD was 11.8 percent and method criteria were met for all compounds except cyclohexane with an RSD of 41.2 percent and heptane with an RSD of 57.4 percent. Results for these compounds should be flagged as estimated, “J”. Valid data was received for all SUMMA canisters submitted; these analyses are considered to be 100 percent complete.

Table 5-2. VOCs Identified in Field Blank

Compound	Concentration in Field Blank Sample (ppbv)	Average Concentration in Samples (ppbv)
Dichlorodifluoromethane	11.95	1240
Vinyl Chloride	10.67	1200
1,3-butadiene	2.15	326
Chloroethane	4.36	634
Ethanol	18.71	394
Isopropyl alcohol	96.84	6630
Methylene chloride	16.02	1110
Acetone	108.43	12800
Hexane	25.47	3980
Vinyl acetate	25.3	44
Cis-1,2-dichloroethene	10.8	1780
Cyclohexane	11.03 J	2270
Chloroform	4.45	485
Ethyl acetate	23.81	4600
Tetrahydrofuran	47.64	2060
2-butanone	114.14	8070
Heptane	36.44 J	3580
Benzene	8.97	1200
Trichloroethylene	4.76	418
Toluene	696.78	30300

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Compound	Concentration in Field Blank Sample (ppbv)	Average Concentration in Samples (ppbv)
Tetrachloroethylene	17.55	1020
1,1,2-trichloroethane	3.36	ND
Ethylbenzene	121.54	8120
Chlorobenzene	2.49	21
m/p-xylene	289.79 J	13600
o-xylene	87.66	5410
Styrene	18.21	1180
1-ethyl-4-methylbenzene	22.38	976
1,3,5-trimethylbenzene	22.38	976
1,2,4-trimethylbenzene	66.83	2190
1,4-dichlorobenzene	40.03	686
1,3-dichlorobenzene	38.27	650
Benzyl chloride	7.05	ND
1,2-dichlorobenzene	1.46	31

J – Value is categorized as an estimate per EPA QA/G-8 guidance

5.2 Audits

This project was designated as QA Category II effort. Hence, audits were required. The internal and external audits performed for this project are described in the following subsections.

5.2.1 EPA Technical Systems Audit

EPA audits were not performed at the Landfill D site. EPA/APPCD Quality Assurance (QA) Representative, Robert Wright, conducted an on-site technical systems audit (TSA) of the field evaluations at Landfill C on May 12-13, 2003. The approved Site-Specific QAPP and the associated field sampling manual provided the technical basis for the audit. The ARCADIS QA Officer, Laura Nessler, accompanied the EPA auditor during the TSA. A report of preliminary findings was received on May 19, 2004 and it was included in the Landfill C report.

5.2.2 Laboratory Audits

Because of the developmental nature of the organo-Hg methods, an internal TSA and PEA were performed by ARCADIS at Frontier Geosciences (Frontier) facilities in Seattle, Washington.

5.2.2.1 Internal Technical Systems Audit (TSA)

In an effort to save project funds by minimizing expenses associated with staff travel, Mr. John Hicks, a Senior Scientist at the ARCADIS Seattle Office, was assigned to perform the laboratory audit. The laboratory audit included observation of spiking procedures for MMHg and DMHg media prior to shipment to the field, and subsequent analysis of project samples for MMHg, DMHg and total Hg. Ms. Laura Nessley provided Mr. Hicks with checklists to use during the audits.

The audits of Frontier's spiking procedures took place on April 29, 2003 for MMHg and May 4, 2004 for DMHg and total Hg. Calibration, media spiking techniques, record keeping and good laboratory practices were the focus of the audit, with special attention paid to the MMHg and DMHg spike preparation for the upcoming field effort. The following Frontier personnel were present for some or all of the audits conducted by ARCADIS:

- Lucas Hawkins Research Associate/Field Sampling/Analyst
- Amber Stewart Total Mercury Laboratory Supervisor
- Melissa Oheara MMHg preparation and distillation
- Cindy Moulder MMHg analysis
- Matt Gomes Total Hg extractions
- Melinda Cowen Senior Laboratory Analyst for total Hg

Some of the primary observations resulting from the first audit included:

- A single source for calibration and spiking was used for MMHg and DMHg. The laboratory had not been able to locate other stable standards for use as an independent source. There were not NIST-traceable standards for organo-Hg.

- Expiration dates for primary MMHg and DMHg standard materials were not available. The MMHg standard bottle had a label dated 1998.
- Written procedures for spiking of impinger solutions or carbon tubes were not evident.
- While work plans state that samples should be kept cold and the organometallic analytes are light sensitive, the analytical standard for MMHg was stored in a clear Teflon bottle on an un-refrigerated shelf across from a large picture window.
- Frontier did not routinely retain an aliquot of spike solution or spiked traps when sending media to a field project.

The continuation of the earlier audit that focused on matrix spiking and media preparation was performed in late May 2004. This audit concentrated on the analysis of the sampling media sent to Landfill site D, including extraction, analysis and calibration procedures for MMHg, DMHg, and total Hg. These audits were conducted on three separate days to accommodate Frontier's analysis schedule. On May 27, 2004, the audit focused on MMHg extraction and distillation as well as DMHg analysis. On May 28, 2004 MMHg analysis and total Hg extraction procedures were audited. On June 3, 2004, the procedures for total Hg analysis were audited.

Significant findings and recommendations resulting from the extraction and analysis portion of the laboratory audit included:

- **Efficiency factor (EF):** An efficiency factor (EF) based on average results from the analyses of distillation blanks was applied to all MMHg sample results. This practice was not discussed in the narrative portion of the Frontier reports and not mentioned by name in the standard operating procedures (SOPs) provided to ARCADIS. This technique essentially boosted analyte recoveries through a multiplied efficiency factor applied to all MMHg results. The current EF is 89.5 percent, therefore all results were normalized to 100 percent recovery levels. For example, a measured value of 100.0 ng detected in an environmental sample was corrected to 110.5 ng after applying the EF. Without a data report disclaimer, this practice misrepresents the results and biases all MMHg results high.
- **Method blank subtraction:** Frontier subtracts the average of the method blanks from each extraction/preparation batch. While scientifically valid, this technique is not acceptable for most EPA-referenced protocols. The laboratory has a

responsibility only to report blank concentrations; adjusting environmental sample concentrations through a data evaluation/validation process is the client's responsibility.

- **MMHg Instrument stability:** Monomethyl Hg (MMHg) analysis was performed over a 2-day period because of poor instrument stability and issues associated with efficiency of the ethylating reagent. Initially, two instruments were set up for calibration on May 27. Only one of the instruments showed sufficient sensitivity and stability to continue analysis. Unfortunately, the initial calibration curve did not meet method specifications, so the instrument was recalibrated and environmental samples analyzed while the ARCADIS auditor was present. The following day, the auditor was informed that the sample set did not meet the QAPP requirements because of unexpected lower concentrations in the samples. The samples were successfully reanalyzed the following day after maintenance was performed on the MMHg analysis instrument. Reanalyzing samples is apparently common and sometimes entire sample sets are reanalyzed more than once. Ms. Moulder stated that it is “the nature” of this analysis to have to frequently recalibrate and reanalyze samples. Calibrations should be closely reviewed during data validation.
- **Calibration Curve Forcing.** ARCADIS learned that, in accordance with Frontier policy, all calibration curve origin points are forced through zero. ARCADIS notes that this procedure is not consistent with most EPA-promulgated methods. ARCADIS recommends reprocessing one calibration curve to determine the impact, if any, to the data.
- **Retention Time Marking:** While observing the MMHg analysis, the analyst did not mark the beginning of the analysis charts with a “tick” time marker, which was particularly critical given that identification of MMHg is primarily determined by retention times or relative retention times. Some of the samples being analyzed had numerous chromatographic peaks including MMHg and other forms of Hg. Based on observation of other laboratory “pods” within Frontier, the marking of the actual start time on the strip chart recorder was not standardized as a procedural practice. Some analysts mark the desorption time on the strip chart recorder and others do not. However, marking of analysis start times should be a requirement of each method in the place of automatic chromatographic data collection (integrators or computer data acquisition) to avoid misidentification of analyte targets. ARCADIS recommends the standardization of marking the start of analysis on strip chart recorders.

- **Digestate Dilution Technique:** The method of bringing the digested total Hg to quantitative volume in a 20 milliliter glass vial was unusual as the technique does not rely on marked, calibrated Class A or B glassware when bringing digested samples to a known quantitative volume. The analyst did not know if the volume of the unmarked vials was recently compared against calibrated glassware, but assumed it was 20 mL. The analyst consistently brought the digested samples to a consistent level that corresponded to the neck of the glass vial. At a minimum, the vials should be calibrated to assure the final volumes are accurate.
- **Sample/Standard Storage:** The temperatures of one refrigerator (“A”) and one freezer (“A”) used to store samples, analytical standards, and frozen ethylating cocktails were not monitored for three days prior to the audit (5/25/04). This did not appear to be a systematic problem, but the analyst did not have an explanation. Verification of temperatures in standard and sample storage areas should be checked daily.
- **Calibration Verification:** While discussed in the previous ARCADIS Audit report dated May 17, 2004, this observation was again included because it is critical to the evaluation of the laboratory and the application of these methods to LFG monitoring. Frontier uses a single source for calibration and spiking for MMHg and DMHg methods. The laboratory has not been able to locate other acceptable, stable standards, such as NIST-traceable standards. Frontier utilizes Standard Reference Materials and certified standards. However, accuracy was only measured for MMHg by comparison to a digested tissue standard and for DMHg by comparison to JSI-1, a material from the JSI Institute in Slovenia. ARCADIS recommends that Frontier make an effort to locate alternate acceptable accuracy standards to verify true concentrations of the main calibration standards.
- **Holding Times:** Holding times were generally not an issue with most analyses Frontier performs, but based on the QAPP, specific holding times to analysis apply to this analysis. This was not documented in the summary report. However the Total, MMHg and DMHg analyses were extracted, but not all analyzed within the 14 day holding time assuming May 27 was the 14th day after sampling. Some data qualification might be necessary, depending on the professional judgment of the data validator.

5.2.3 Internal Performance Evaluation Audits (PEA)

Because there is not a currently promulgated method for organo-Hg sampling and analysis, PEA samples were integrated in to the sampling matrix to evaluate accuracy and precision of the methods used by Frontier. ARCADIS subcontracted an independent laboratory to assist in preparation of the PEA samples. The laboratory was Cebam Analytical located in Seattle, Washington. All standards and stock solutions were prepared and verified by a Cebam Analytical analyst.

Two PEA samples were prepared for total Hg. Trap A was spiked with 9.99 ng THg by a Cebam analyst. This concentration was verified by Cebam by performing six replicate analyses. Samples were analyzed by Frontier Geosciences as described in the report titled *Determination of Total, Dimethyl, and Methyl Mercury in Raw Landfill Gas at Pinconning and Montrose Michigan*. Recovery results are presented in Table 5-3. Relative percent difference (RPD) between the duplicate samples was 1.0 percent.

Table 5-3. Total Mercury PEA Results

Sample ID	Total Hg Measured (ng)	Total Hg Spiked (ng)	Recovery (%)
C-052104-01	13.60	9.99	136
C-052104-02	13.47	9.99	135

One PEA sample was prepared and analyzed for MMHg. A 2.0 ng/L spiking solution was prepared by transferring a 0.2 mL aliquot of 10 ng/mL standard into a 1L pre-cleaned glass volumetric flask. The sample was analyzed by Frontier Geosciences as described in the report titled *Determination of Total, Dimethyl, and Methyl Mercury in Raw Landfill Gas at Pinconning and Montros, Michigan*. Recovery results are presented in Table 5-4. Because only one sample was prepared, precision for this analysis could not be evaluated.

Table 5-4. MMHg PEA Results

Sample ID	Total MMHg Measured (ng/L)	Total MMHg Spiked (ng/L)	Recovery (%)
040513-BR-MHg7	2.327	2.00	117

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Two PEA samples were prepared and analyzed for DMHg. Trap A and Trap B were spiked with 0.215 ng DMHg for a total concentration of 0.430 ng per train. This concentration was verified by Cebam by analyzing five replicate samples of the standard.

The samples were analyzed by Frontier Geosciences as described in the report titled *Determination of Total, Dimethyl, and Monomethyl Mercury in Raw Landfill Gas at Pinconning and Montros, Michigan*. Recovery results are presented in Table 5-5. The RPD between the duplicate samples was 23 percent.

Table 5-5. DMHg PEA Results

Sample ID	Total MMHg Measured (ng)*	Total MMHg Spiked (ng)*	Recovery (%)
ARCADIS DMM Spike #1	0.234	0.430	54.4
ARCADIS DMM Spike #2	0.295	0.430	68.6

*Trap A and Trap B together

In conclusion, the MQO for recovery for total Hg and organo-Hg samples (as defined in the QAPP) was established at 50-150 percent. All PEA samples met this objective. The RPD between duplicate samples was also acceptable. The full text of the TSA and PEA audit reports and completed checklists are included in Appendix S.



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Appendix E

**SOURCE TEST REPORT
FOR LANDFILL E**

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- E. Organic mercury Method (Mercury, Total, Monomethyl, Dimethyl)
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- G. Hydrogen Sulfide
- H. Continuous Emission Monitor (Data and Charts)
- I. Method 23 (PAH)
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- L. Method 29 (Metals)
- M. Method 26A (HCl)
- N. Analyte Concentration and Mass Flow Rate Computation Worksheets
- P. Raw Field Data Records
- Q. CEM Calibration Records and Span Gas Certification
- R. Sampling Control Meter Boxes Calibration Record

Acronym List

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Acronym List

%D	Percent drift
AP-42	Compilation of Air Pollutant Emission Factors
APPCD	Air Pollution Prevention Control Division
ARCADIS	ARCADIS G&M, Inc.
As	Arsenic
AS	Alternative standard
CCVs	Continuing calibration verification samples
Cd	Cadmium
CEMS	Continuous emission monitoring system
CH ₄	Methane
Cl ₂	Chlorine
CO	Carbon monoxide
CO ₂	Carbon dioxide
Cr	Chromium
DMHg	Dimethyl mercury
EPA	US Environmental Protection Agency
ES	Extraction standard
FID	Flame ionization detector
GC/FID	Gas chromatograph/flame ionization detector
GC/MS	Gas chromatograph/mass spectrometer
HCl	Hydrogen chloride
Hg	Mercury
H ₂ S	Hydrogen sulfide
ICVs	Internal calibration verification samples
LFG	Landfill gas
MDLs	Method detection levels
MMHg	Monomethyl mercury
Mn	Manganese

Acronym List

MQOs	Measurement quality objectives
MSW	Municipal solid waste
N ₂	Nitrogen
Ni	Nickel
NMOCs	Non-methane organic compounds
NO _x	Nitrogen oxides
O ₂	Oxygen
PAHs	Polynuclear aromatic hydrocarbons
Pb	Lead
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality control
RF	Response factor
RPD	Relative percent difference
RRF	Relative response factors
RSD	Relative standard deviation
RTP	Research Triangle Park
SO ₂	Sulfur dioxide
SS	Sampling standards
TCDD/TCDFs	Dioxins/furans
THCs	Total hydrocarbons
TICs	Tentatively identified compounds
VOCs	Volatile organic compounds

1. Introduction

Large municipal solid waste (MSW) landfills are subject to Clean Air Act regulations because of emissions that can contribute to environmental and health concerns. Landfills are listed as a source of air toxics in the Urban Air Toxics Strategy for future evaluation of residual risk. Existing emission factors for landfill gas (LFG) were largely developed using data from the 1980s and early 1990s. A database was developed summarizing data from approximately 1,200 landfills, along with emissions information from literature, and from test reports prepared by state and local government agencies and industry. These data were summarized in *Compilation of Air Pollutant Emission Factors (AP-42)*, Chapter 2.4. Requirements for landfill gas control for new and existing MSW landfills are in 40 CFR Parts 51, 52, and 60, *Standards of Performance for New Stationary Sources and Guidelines for Control of Existing Sources: Municipal Solid Waste Landfills*.

The overall purpose of this testing program was to generate data that could be used to update AP-42 and to include data that reflect current waste management operating practices. Emission factors are used in determining applicability to Clean Air Act regulations, developing emission inventories, and for evaluating potential health concerns associated with LFG emissions.

This report presents the results of a field test conducted at Landfill E, located in a Midwest state. Testing took place on June 22 and 23, 2005.

The site uses a boiler for destruction of the LFG. A more detailed description of the boiler is presented in Section 2. The specific purpose of the testing program was to determine the gas quality of raw LFG (sampling the header pipe prior to gas cleaning) and the emissions of the boiler stack. The pollutants of interest for the raw untreated landfill gas were volatile organic compounds (VOCs), non-methane organic compounds (NMOCs), hydrogen sulfide (H₂S), carbonyls (acetaldehyde and formaldehyde), and mercury (Hg) compounds. The pollutants of interest for the treated LFG, in this case at the boiler stack, were carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), NMOCs as total hydrocarbons (THCs), hydrogen chloride (HCl), total Hg, dioxins/furans (PCDD/PCDFs), polycyclic aromatics hydrocarbons (PAHs), and metals.

ARCADIS G&M, Inc. (ARCADIS), as contractor to the US Environmental Protection Agency's (EPA) Air Pollution Prevention and Control Division (APPCD), performed this work under Work Assignment 1-27 of Onsite Laboratory Support Contract (EP-C-

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04-023). The testing activities followed the specifications of the approved “*Site-Specific Quality Assurance Project Plan for the Field Evaluations of Landfill Gas Control Technologies Landfill E*” dated May 2005.

2. Landfill E Facility Descriptions

Available information indicates that Landfill E began operation in 1971. As of June 2005, the landfill had 14,500,000 metric tons of waste in place over an area of 240 acres. The LFG extraction rate was 4,800 standard cubic feet per minute. The landfill had 320 vertical wells that feed into a main header pipe. The raw LFG was filtered, de-watered, and compressed prior to being piped for use either off-site or on-site. The different uses of LFG at this site are identified in Table 2-1. Demand and seasonal factors largely determine the use pattern; maximum and minimum rates. The base-load steam boiler at Customer A's facility was tested in this program.

Table 2-1. Devices Utilizing Landfill E LFG

LFG End User	Devices	LFG Utilization Rate (scfm)
Customer A	Base-load Steam Boiler	500 - 3400
Customer A	Gas Turbine Generator	1300 -1700
Customer B	Greenhouse Hot Water Boiler	100 - 500
Customer C	Asphalt Plant Kiln Burner	500 -1400
On-site	IC Engine/Micro Turbine Generators	200
On-site	Four Candlestick Flares	600 per flare
On-site	Candlestick Flare	2825

2.1 Boiler Process Description and Operation

The tested boiler was a Combustion Engineering Model 33-7KT-10, A-Type Package Boiler, rated at 80,000 pounds-per-hour of 250 psi steam. The boiler was fueled by the collected LFG and produced base-load steam for Customer A's industrial facility. The boiler was located on Customer A's property, approximately 3 miles from Landfill E. Figure 2-1 shows a simplified process schematic of the LFG-boiler system.

Information related to the boiler's ability to destroy potential pollutants was not available.

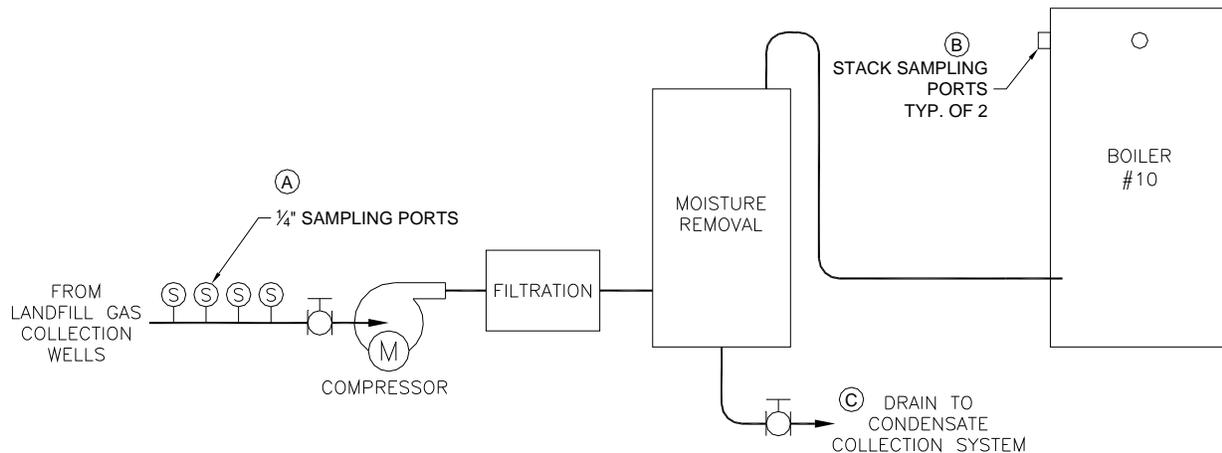


Figure 2-1. Simplified Landfill E LFG Boiler Process Flow Diagram

2.2 Source Sampling Locations

Raw LFG samples were collected at the landfill gas pipe (location labeled “A”). Samples of treated gas were collected at the boiler stack (location labeled “B”), as depicted in Figure 2-1.

2.2.1 Landfill Gas (LFG) Header Pipe

Raw untreated LFG samples were collected from the header pipe, as it emerged from the ground, upstream of processing units. Figure 2-2 is a photograph of the raw LFG header pipe before it passes into the gas control-and-process system. The pipe is 16 inches in inner diameter. At the sampling point, four 1/4-inch gas taps were installed. Through these ports, gases were withdrawn to obtain the test samples.

Isokinetic sampling and accurate velocity measurement requires the measurement point to have at least eight pipe diameter of straight pipe upstream and two pipe diameter of disturbance-free pipe downstream. The header pipe at Landfill E did not meet this requirement. Therefore, isokinetic sampling was not attempted at this location. Furthermore, the short pipes between the upstream and downstream bends precluded accurate measurement of the volumetric flow rate of the raw LFG.



Figure 2-2. Raw Landfill Gas Collection Pipe

2.2.2 Boiler Stack

A picture of the boiler stack is shown in Figure 2-3. The picture shows the arrangement of the sampling ports. The boiler stack was 76.5 inches in diameter and had two 6-inch sampling ports installed 90 degrees apart. Figure 2-4 illustrates the cross-sectional dimensions of the boiler stack and includes the locations of the sample traverse points. Isokinetic sampling was possible at this location and was followed.



Figure 2-3. Boiler Stack

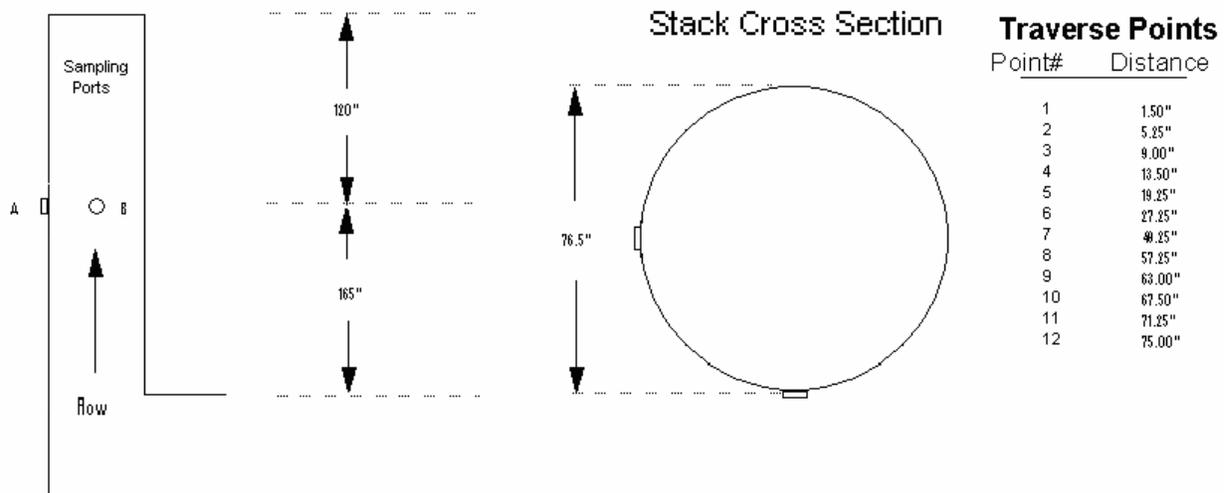


Figure 2-4. Boiler Stack Dimension and Sampling Traverse Locations

3. Test Operations

As stated previously, the purpose of the sampling program was to determine the quality of raw LFG and emissions from the boiler stack.

3.1 Test Team

The tests were conducted by a team of seven individuals. The team members and their primary duties are listed in Table 3-1.

Table 3-1. Test Team Members and Responsibilities

Role	Primary Duty
Test Engineer	Field Supervisor
Chemical Technician	Sample train preparation and recovery
Test Engineer	Sample train operator at raw LFG inlet pipe
Sampling Technician	Sample train operator at stack
Sampling Technician	Sample train operator at stack
CEMS Technician	CEMS operations
Senior Chemist (Frontier Geosciences)	Mercury measurements

3.2 Test Log

3.2.1 Planned Test Sample Matrices

The list of target samples to be collected and measurements to be taken are specified in the Quality Assurance Project Plan (QAPP) dated June 2005. These are reiterated here for completeness. Table 3-2 lists the target compounds of interest for the raw untreated LFG, collected at the raw LFG pipe. Table 3-3 lists the target compounds of interest for the treated gas, at the boiler stack.

Table 3-2. Target Analytes for the Raw Landfill Gas Stream

Volatil e compounds	Volatil e compounds (continued)	Carbonyls
Methane	Ethylene dibromide	Acetaldehyde
Ethane	Ethylene dichloride	Formaldehyde
Propane	Methyl chloroform	
Butane	Methyl isobutyl ketone	Mercury
Pentane	Methylene chloride	Organo-mercury compounds
Hexane	Propylene dichloride	Total
Carbonyl sulfide	t-1,2-Dichloroethene	Elemental
Chlorodifluoromethane	Tetrachloroethene	
Chloromethane	Toluene	Gases
Dichlorodifluoromethane	Trichlorethylene	Carbon dioxide
Dichlorofluoromethane	Vinyl chloride	Oxygen
Ethyl chloride	Vinylidene chloride	
Fluorotrichloromethane	Ethanol	
1,3-Butadiene	Methyl ethyl ketone	
Acetone	2-Propanol	
Acrylonitrile	1,4-Dichlorobenzene	
Benzene	Ethylbenzene	
Bromodichloromethane	Xylenes	
Carbon disulfide		
Carbon tetrachloride		
Chlorobenzene	Non-methane organic compounds	
Chloroform		
Dimethyl sulfide	Reduced sulfur compounds	
Ethyl mercaptan	Hydrogen sulfide	

Table 3-3. Target Analytes for the Boiler Stack Outlet Gas Stream

Gases	Mercury
Oxygen	Total
Carbon dioxide	
Carbon monoxide	Metals
Nitrogen oxide	Lead, arsenic, cadmium, chromium, manganese, nickel
Sulfur dioxide	
Total hydrocarbons	Dioxins/Furans
Non-methane organic compounds (as THCs)	
	Polycyclic aromatic hydrocarbons
Hydrogen chloride	

3.2.2 Landfill Gas (LFG) Pipe (Inlet)

Figure 3-1 is a photograph of sampling operations taking place at the raw LFG header pipe. Collection of raw LFG samples took two days to complete. Table 3-4 lists the samples that were collected from the raw LFG pipe.

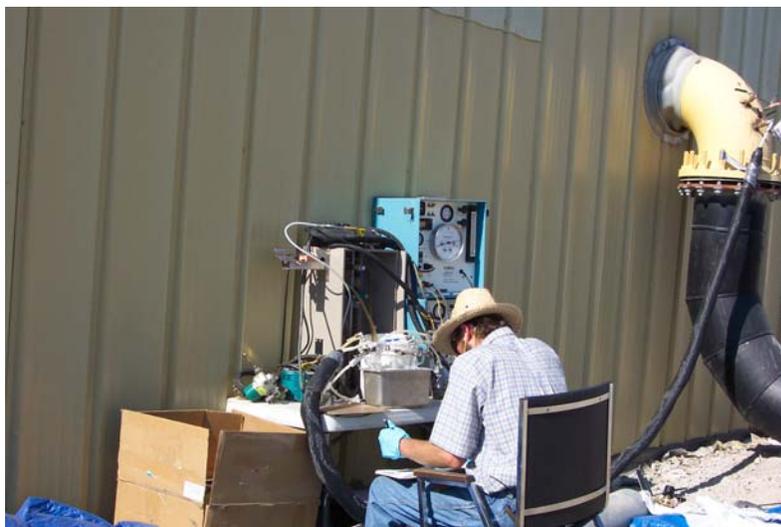


Figure 3-1. Sampling Operations at the Raw Landfill Gas Header Pipe

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Table 3-4. Landfill E Raw LFG Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 40 (TO-15, 25C 3C)					
	E-Pre-M40-062205-01	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	06/22/05	08:03 - 09:03
	E-Pre-M40-062205-02	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	06/22/05	10:25 - 11:25
	E-Pre-M40-062205-03	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	06/22/05	12:24 - 13:24
	E-Pre-M40-062205-04	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Test	06/22/05	14:20 - 15:20
	E-Pre-M40-062305-B	VOCs/NMOCs/O ₂ /CO ₂ ,N ₂	Field Blank	06/23/05	08:28 – 09:28
EPA Method 0100					
	E-Pre-M0100-062205-01	Carbonyls	Test	06/22/05	09:11 – 09:41
	E-Pre-M0100-062205-02	Carbonyls	Test	06/22/05	11:39 – 12:09
	E-Pre-M0100-062205-03	Carbonyls	Test	06/22/05	13:28 – 13:58
	E-Pre-M0100-062205-B	Carbonyls	Field Blank	06/22/05	14:01
EPA Method 11					
	E-Pre-M0011-062205-01	H ₂ S	Test	06/22/05	15:32 - 15:42
	E-Pre-M0011-062205-02	H ₂ S	Test	06/22/05	16:31 - 16:41
	E-Pre-M0011-062205-03	H ₂ S	Test	06/22/05	17:21 - 17:31
	E-Pre-M0011-062205-B	H ₂ S	Reagent Blank	06/22/05	-
Lumex Instrument					
	E-Pre-EM-062305-01	Elemental Hg ^a	Test	06/23/05	~09:50
	E-Pre-EM-062305-02	Elemental Hg ^a	Test	06/23/05	~09:55
	E-Pre-EM-062305-03	Elemental Hg ^a	Test	06/23/05	~10:00
Frontier					
	062205-Site E-STM1	Total gaseous Hg	Test	06/22/05	13:39 - 14:39
	062205-Site E-STM2	Total gaseous Hg	Test	06/22/05	14:53 - 15:54
	062205-Site E-STM3	Total gaseous Hg	Test	06/22/05	17:00 - 18:01
	062205-Site E-STMBLK	Total gaseous Hg	Field Blank	06/22/05	18:09
Frontier					
	062305-Site E-MMHg1	Monomethyl Hg	Test	06/23/05	08:34 - 09:34
	062305-Site E-MMHg2	Monomethyl Hg	Test	06/23/05	10:29 – 11:29
	062305-Site E-MMHg3	Monomethyl Hg	Test	06/23/05	11:59 - 12:59

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
	062305-Site E-MMHgBLK	Monomethyl Hg	Field Blank	06/23/05	13:28
	062305-Site E-MMHgSPK	Monomethyl Hg	Spike	06/23/05	13:53 - 14:53
Frontier					
	062205-Site E-DMHg1	Dimethyl Hg	Test	06/22/05	13:10 - 13:15
	062205-Site E-DMHg2	Dimethyl Hg	Test	06/22/05	13:55 - 14:01
	062205-Site E-DMHg3	Dimethyl Hg	Test	06/22/05	15:00 - 15:08
	062205-Site E-DMHgBLK	Dimethyl Hg	Field Blank	06/22/05	18:00
	062205-Site E-DMSPK	Dimethyl Hg	Spike	06/22/05	15:28 - 15:34
Geochemica					
	062205-Site-E-DMHg-blk	Dimethyl Hg	Field Blank	06/22/05	--
	062205-Site-E-DMHg-1	Dimethyl Hg	Test	06/22/05	13:10 - 13:15
	062205-Site-E-DMHg-2	Dimethyl Hg	Test	06/22/05	13:55 - 14:01
	062205-Site-E-DMHg-3	Dimethyl Hg	Test	06/22/05	15:00 - 15:07
	062205-Site-E-DMHg-spk	Dimethyl Hg	Spike	06/22/05	15:28 - 15:34
Geochemica					
	062205-Site-E-STM-1	Total gaseous Hg	Test	06/22/05	13:39 - 14:39
	062205-Site-E-STM-blk	Total gaseous Hg	Field Blank	06/22/05	18:09
	062205-Site-E-STM-4	Total gaseous Hg	Test	06/22/05	17:00 - 18:01
	062205-Site-E-STM-2	Total gaseous Hg	Test	06/22/05	14:53 - 15:54
Geochemica					
	062305-Site-E-MMHg-spk	Monomethyl Hg	Spike	06/23/05	13:53 -14:53
	062305-Site-E-MMHg-1	Monomethyl Hg	Test	06/23/05	08:34 - 09:34
	062305-Site-E-MMHg-2	Monomethyl Hg	Test	06/23/05	10:29 - 11:29
	062305-Site-E-MMHg-3	Monomethyl Hg	Test	06/23/05	11:59 - 12:59
	062305-Site-E-MMHg-blk	Monomethyl Hg	Field Blank	06/23/05	13:28

^a Represents 3 readings, each ~60-seconds in duration

3.2.3 Boiler Stack

The boiler stack gases were sampled for measurement of NMOCs (as THC_s), HCl, metals (lead [Pb], arsenic [As], cadmium [Cd], chromium [Cr], manganese [Mn], nickel [Ni]), PCDD/PCDFs, PAHs, total Hg, SO₂, NO_x, CO, carbon dioxide (CO₂), and oxygen (O₂). Sampling of the boiler stack gases was conducted by inserting sampling probes into the stack pipe and withdrawing the gases with the various sampling trains. The boiler stack cross-section was divided into 24 equal areas according to EPA Method 1. The sample probe was placed in each of these 24 areas to extract equal amounts of gas sample from each area. Sampling at the boiler stack was conducted at isokinetic conditions.

Accessing the sampling ports required the aid of scaffold platforms. Figure 3-2 shows the stack and the sampling scaffold platforms. Figure 3-3 shows a sampling train in place during sample collection at the boiler stack.



Figure 3-2. Sampling Operations at the Boiler Stack



Figure 3-3. Sampling Train at the Boiler Stack

Sample run times for the Method 26A HCl trains and the Method 29 metals trains were 120-minutes. Run times for the Method 23 PCDD/PCDF and PAH trains were 240 minutes. Run times for continuous emission monitoring system (CEMS) parameters (SO₂, NO_x, CO, O₂, CO₂, and THCs) varied and were timed to coincide with the collection periods of the other samples. Table 3-5 lists the sample collections times and samples collected from the boiler stack

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Table 3-5. Boiler Stack Test Sample Log and Collection Times

Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
EPA Method 3A (CEM)					
	E-Post-M3A-062205-01	O ₂	Test	06/22/05	10:42 - 15:53
	E-Post-M3A-062205-02	O ₂	Test	06/22/05	16:50 - 19:43
	E-Post-M3A-062305-03	O ₂	Test	06/23/05	08:33 – 13:26
	E-Post-M3A-062305-04	O ₂	Test	06/23/05	14:38 - 16:12
EPA Method 3A (CEM)					
	E-Post-M3A-062205-01	CO ₂	Test	06/22/05	10:42 - 15:53
	E-Post-M3A-062205-02	CO ₂	Test	06/22/05	16:50 - 19:43
	E-Post-M3A-062305-03	CO ₂	Test	06/23/05	08:33 – 13:26
	E-Post-M3A-062305-04	CO ₂	Test	06/23/05	14:38 - 16:12
EPA Method 10 (CEM)					
	E-Post-M10-062205-01	CO	Test	06/22/05	10:42 - 15:53
	E-Post-M10-062205-02	CO	Test	06/22/05	16:50 - 19:43
	E-Post-M10-062305-03	CO	Test	06/23/05	08:33 – 13:26
	E-Post-M10-062305-04	CO	Test	06/23/05	14:38 - 16:12
EPA Method 7E (CEM)					
	E-Post-M7E-062205-01	NO _x	Test	06/22/05	10:42 - 15:53
	E-Post-M7E-062205-02	NO _x	Test	06/22/05	16:50 - 19:43
	E-Post-M7E-062305-03	NO _x	Test	06/23/05	08:33 – 13:26
	E-Post-M7E-062305-04	NO _x	Test	06/23/05	14:38 - 16:12
EPA Method 6C (CEM)					
	E-Post-M6C-062205-01	SO ₂	Test	06/22/05	10:42 - 15:53
	E-Post-M6C-062205-02	SO ₂	Test	06/22/05	16:50 - 19:43
	E-Post-M6C-062305-03	SO ₂	Test	06/23/05	08:33 – 13:26
	E-Post-M6C-062305-04	SO ₂	Test	06/23/05	14:38 - 16:12
EPA Method 25A (CEM)					
	E-Post-M25A-062205-01	NMOCs (THC)	Test	06/22/05	10:42 - 15:53
	E-Post-M25A-062205-02	NMOCs (THC)	Test	06/22/05	16:50 - 19:43
	E-Post-M25A-062305-03	NMOCs (THC)	Test	06/23/05	08:33 – 13:26
	E-Post-M25A-062305-04	NMOCs (THC)	Test	06/23/05	14:38 - 16:12
Lumex Instrument					
	E-Post-EM-062205-01	Elemental Hg ^a	Test	06/23/05	~16:30
	E-Post-EM-062205-02	Elemental Hg ^a	Test	06/23/05	~16:35

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Sampling Method	Run Number	Analyte(s)	Sample Class	Date	Run Period
	E-Post-EM-062305-03	Elemental Hg ^a	Test	06/23/05	~16:40
	E-Post-EM-062305-04	Elemental Hg ^a	Test	06/23/05	~16:45
	E-Post-EM-062305-05	Elemental Hg ^a	Test	06/23/05	~16:50
EPA Method 26A					
	E-Post-M26A-062205-01	HCl	Test	06/22/05	17:18 - 19:42
	E-Post-M26A-062305-02	HCl	Test	06/23/05	08:47 - 10:50
	E-Post-M26A-062305-03	HCl	Test	06/23/05	14:09 - 16:12
EPA Method 23					
	E-Post-M23-062205-01	PCDD/PCDFs, PAHs	Test	06/22/05	11:41 - 16:02
	E-Post-M23-062205-02	PCDD/PCDFs, PAHs	Test	06/22/05	11:43 - 15:58
	E-Post-M23-062305-03	PCDD/PCDFs, PAHs	Test	06/23/05	08:52 - 12:56
EPA Method 29					
	E-Post-M29-062205-01	Metals	Test	06/22/05	17:21 - 19:45
	E-Post-M29-062305-02	Metals	Test	06/23/05	11:27 - 13:31
	E-Post-M29-062305-03	Metals	Test	06/23/05	14:06 - 16:19

^a Represents three readings, each ~60-seconds in duration

3.3 Field Test Changes and Deviations from Quality Assurance Project Plan (QAPP) Specifications

3.3.1 Variation from Test Methods or Planned Activities

3.3.1.1 *Sampling at the Landfill Gas (LFG) Inlet Pipe*

There were not variations from test methods or planned activities at the raw LFG pipe.

3.3.1.2 *Raw Landfill Gas (LFG) Inlet Pipe Condensate Sample*

Raw LFG pipe condensate sample was not planned and was not collected.

3.3.1.3 *Raw Landfill Gas (LFG) Flow Rate Measurement*

A control panel at the landfill displays real-time raw LFG flow rates. The accuracy of the indicated measurement will need to be verified by the facility operator based on instrument calibration and certification records. Moreover, the accuracy of the flow

rate measurement cannot be verified as part of this program because of the tightly configured geometry of the raw LFG pipe which precluded accurate gas velocity measurements. Within these physical limitations, the test team nonetheless made approximate velocity measurements by traversing the pipe using a standard pitot probe. The accuracies of these measurements are unknown and the measurements should be viewed with caution.

3.3.1.4 Boiler Stack

There were not variations from test methods or planned activities at the boiler stack.

3.3.2 Application of Test Methods

The sampling and, where applicable, analytical methods used in this test program follow those specified in the QAPP.

3.3.3 Test Method Exceptions

Laboratory analytical procedures followed those prescribed by the specified methods, with the following exceptions:

Raw LFG at Inlet

- Carbonyls were analyzed by Method TO-11 SW-846 Method 8315. Method TO-11 and 8315 close resemble each other.
- Landfill gas NMOCs were analyzed by the gas chromatograph/mass spectrometer (GC/MS) Method as described in EPA Publication EPA/600-R-98/16.
- For LFG inlet samples, VOCs and methane (CH₄) were analyzed by EPA Method TO-15.

Boiler Stack

- Non-Methane Organic Compounds (NMOCs) - Method 25A was used instead of the specifically applicable Method 25C. This was necessitated by the low analyte concentration which rendered Method 25C inappropriate for the intended measurement.

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Table 3-6. Test Methods and Performing Organizations

Procedure	Description	Performing Organization
EPA Method 1	Selection of boiler stack traverse points	ARCADIS G&M
EPA Method 2	Determination boiler stack gas velocity and volumetric flow rate	ARCADIS G&M
EPA Method 3A	Determination of oxygen (O ₂) and carbon dioxide (CO ₂) for boiler stack gas molecular weight calculations	ARCADIS G&M
EPA Method 3C	Determination of carbon dioxide (CO ₂), methane (CH ₄), nitrogen (N ₂), and oxygen (O ₂) in raw LFG	Triangle Environmental Services
EPA Method 4	Determination of boiler stack gas moisture	ARCADIS G&M
EPA Method 6C	Determination of boiler stack sulfur dioxide (SO ₂)	ARCADIS G&M
EPA Method 7E	Determination of boiler stack nitrogen oxides (NO _x)	ARCADIS G&M
EPA Method 10	Determination of boiler stack carbon monoxide (CO)	ARCADIS G&M
EPA Method 11	Determination of raw LFG hydrogen sulfide (H ₂ S)	Enthalpy Analytical
EPA Method 23	Determination of boiler stack: Dioxins/furans by Method 8290 Polycyclic aromatic hydrocarbons (PAHs) by Method 8270	ALTA Analytical Perspectives
EPA Method 25A	Determination of boiler stack gas non-methane organic compounds (NMOCs) (as total hydrocarbons [THCs]) when total organic concentration is less than the 50 ppm Method 25C applicability threshold	ARCADIS G&M
EPA Method 25C	Determination of raw LFG NMOCs	Triangle Environmental Services
EPA Method 26A	Determination of boiler stack hydrogen chloride (HCl)	Resolution Analytics
EPA Method 29	Determination of boiler stack metals	First Analytical Laboratories
EPA Method 40	Determination of raw LFG volatile organic compounds (VOCs)	Research Triangle Park Laboratories
SW-846 Method 0100/TO-11	Determination of raw LFG carbonyls (formaldehyde and acetaldehyde)	Resolution Analytics
LUMEX instrument	Determination of raw LFG and boiler stack elemental mercury (Hg ⁰)	ARCADIS G&M
Organic mercury methods	Determination of raw LFG: Monomethyl mercury Dimethyl mercury Total mercury.	Frontier Geosciences

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4. Presentation of Test Results

Results of the testing are presented in this section. Detailed test results are included in the Appendices. The following subsections provide concise summaries of the test results.

Section 4.1 and its subsections present the test results obtained from the raw LFG measurements (at location “A”, see Figure 2-1). The concentrations of the constituents of interest in the raw LFG are presented in Sections 4.1.2.1 through 4.1.2.5.

Section 4.2 and its subsections present the test results related to the boiler and the boiler stack (at location “B”, see Figure 2-1).

Section 4.3 summarizes the data and presents a comparison with the AP-42 default values.

4.1 Raw Landfill Gas (LFG) Measurements

As shown in Figure 2-2, sampling was conducted by extracting samples via the four ¼-inch ports installed in the raw LFG pipe.

4.1.1 Raw Landfill Gas (LFG) Flow Rate and Temperature

4.1.1.1 Direct Measurements

The estimated mass flow rates of the constituents in the raw LFG pipe were calculated based on the flow rate indicated by the facility’s flowmeter display. This approach was selected because:

- The pitot probe readings were subject to large errors because of the not fully developed velocity profile inside the tightly configured LFG pipe.
- The facility flowmeter readings were likely accurate because the indicated readings were probably the basis on which financial arrangements between the landfill owner and its customers were made and settled.

During these tests, the panel meter displayed flow rates ranging from 4335 to 4340 scfm. This was the total LFG flow going to all users, not just to the tested boiler.

Measurement of the velocity profile within the raw LFG pipe using a velocity probe returned readings of approximately 3856 scfm.

A direct measurement with a thermocouple showed the raw LFG temperature to be 71°F.

4.1.2 Raw Landfill Gas (LFG) Constituent Analytes

4.1.2.1 Volatile Organic Compounds (VOCs)

Concentrations of VOCs were obtained by collecting summa canister samples using Method 40 procedures. Analysis was performed by Method TO-15, with gas chromatography and mass spectrometry (GC/MS). The alkanes (C2 through C6), being present in much higher concentrations, were analyzed by GC flame ionization detection (FID) on the same summa canister samples.

Table 4-1 lists the results of these analyses. Tentatively identified compounds (TICs) can be seen in the Research Triangle Park (RTP) Laboratory reports in Appendix A.

Table 4-1. Raw Landfill Gas VOC Concentrations

Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
Analyzed by GC/FID						
Ethane	ppmv	1	13.0	13.6	14.0	14.0
Propane	ppmv	1	13.6	12.6	12.8	13.0
Butane	ppmv	1	3.7	3.4	ND	3.6
Pentane	ppmv	1	2.9	ND	ND	1.0
Hexane	ppmv	1	ND	ND	ND	ND
Analyzed by TO-15 GC/MS						
Dichlorodifluoromethane (Freon 12)	ppbv	0.3	248	206	242	232
1,2-Chloro-1,1,2,2-tetrafluoroethane	ppbv	0.2	ND	23.7	22.2	15.3
Chloromethane	ppbv	0.1	ND	ND	ND	ND
Vinyl chloride	ppbv	0.2	ND	190	ND	63
1,3-Butadiene ((Vinylethylene)	ppbv	0.3	ND	ND	ND	ND

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
Bromomethane (Methyl Bromide)	ppbv	0.2	ND	ND	ND	ND
Chloroethane (Ethyl Chloride)	ppbv	0.2	ND	ND	ND	ND
Trichloromonofluoromethane (CFC11)	ppbv	0.2	24.4	ND	ND	8.1
1,1-Dichloroethene	ppbv	0.2	ND	ND	ND	ND
1,1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	ppbv	0.2	ND	ND	ND	ND
Ethanol ^d	ppbv	0.2	ND J	ND J	ND J	ND J
Carbon Disulfide	ppbv	0.2	1020	ND	ND	339
Isopropyl Alcohol (2-Propanol) ^e	ppbv	0.2	5030 J	1110 J	944 J	2360 J
Methylene chloride (Dichloromethane)	ppbv	0.1	3720	3020	2400	3050
Acetone	ppbv	0.3	21800	12900	11900	15500
t-1,2-dichloroethene	ppbv	0.3	ND	ND	ND	ND
Hexane ^f	ppbv	0.3	655 J	534 J	601 J	597 J
Methyl-t-butyl ether (MTBE)	ppbv	0.3	ND	ND	ND	ND
1,1-Dichloroethane	ppbv	0.3	ND	ND	ND	ND
Vinyl Acetate	ppbv	0.5	110	120	102	111
cis-1,2-Dichloroethene	ppbv	0.3	180	134	175	163
Cyclohexane	ppbv	0.3	ND	ND	ND	ND
Chloroform	ppbv	0.3	ND	ND	ND	ND
Ethyl Acetate	ppbv	0.3	ND	ND	ND	ND
Tetrahydrofuran (Diethylene Oxide)	ppbv	0.4	1090	692	832	870
1,1,1-Trichloroethane	ppbv	0.3	ND	ND	ND	ND
Carbon Tetrachloride	ppbv	0.5	ND	ND	ND	ND
2-Butanone (Methyl Ethyl Ketone)	ppbv	0.3	3270	1920	2290	2490
Heptane ^b	ppbv	0.2	380	282	332	331
Benzene	ppbv	0.2	998	764	900	887
1,2-Dichloroethane	ppbv	0.3	ND	ND	ND	ND

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
Trichloroethylene (Trichloroethene)	ppbv	0.2	110	73.7	98.3	93.9
1,2-Dichloropropane	ppbv	0.3	ND	ND	ND	ND
Bromodichloromethane	ppbv	0.2	ND	ND	ND	ND
1,4-Dioxane (1,4-Diethylene Dioxide)	ppbv	0.2	ND	ND	ND	ND
cis-1,3-Dichloropropene	ppbv	0.2	ND	ND	ND	ND
Toluene (Methyl Benzene)	ppbv	0.3	8780	6860	8220	7950
4-Methyl-2-pentanone (MIBK)	ppbv	0.2	ND	ND	ND	ND
t-1,3-Dichloropropene	ppbv	0.2	ND	ND	ND	ND
Tetrachloroethylene (Perchloroethylene)	ppbv	0.3	128	125	122	125
1,1,2-Trichloroethane	ppbv	0.2	ND	ND	ND	ND
Dibromochloromethane	ppbv	0.2	ND	ND	ND	ND
1,2-Dibromoethane (Ethylene dibromide)	ppbv	0.2	ND	ND	ND	ND
2-Hexanone (Methyl Butyl Ketone)	ppbv	0.2	ND	ND	ND	ND
Ethylbenzene	ppbv	0.3	ND	ND	ND	ND
Chlorobenzene	ppbv	0.2	132	139	134	135
m/p-Xylene (Dimethyl Benzene) ^g	ppbv	0.65	9670 J	7830 J	9500 J	9000 J
o-Xylene (Dimethyl Benzene)	ppbv	0.3	3460	2670	3180	3100
Styrene (Vinylbenzene)	ppbv	0.1	491	314	455	420
Tribromomethane (Bromoform)	ppbv	0.3	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	ppbv	0.2	ND	ND	ND	ND
1-Ethyl-4-methylbenzene (4-Ethyl Toluene) ^c	ppbv	0.2	2540	2250	2750	2510
1,3,5-Trimethylbenzene	ppbv	0.2	1040	919	1150	1040
1,2,4-Trimethylbenzene	ppbv	0.3	2740	2390	2800	2640
1,3-Dichlorobenzene	ppbv	0.2	ND	ND	ND	ND
1,4-Dichlorobenzene	ppbv	0.3	ND	ND	ND	ND

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Compound	Unit	MDL	Concentration			
			Run 1	Run 2	Run 3	Average ^a
Benzyl Chloride	ppbv	0.2	ND	ND	ND	ND
1,2-Dichlorobenzene	ppbv	0.3	ND	ND	ND	ND
1,1,2,3,4,4-Hexachloro-1,3-butadiene	ppbv	0.2	ND	ND	ND	ND
1,2,4-Trichlorobenzene	ppbv	0.3	ND	ND	ND	ND
Chlorodifluoromethane (Freon 22)	ppbv	20	ND	ND	ND	ND
Acrylonitrile	ppbv	20	ND	ND	ND	ND

ND - Constituent not found at detection stated method detection limit

^a Average - equals ND if all three measurements are ND. Otherwise, ND contribution to the average is equal to 50 percent of the analyte MDL

^b Field blank reported heptane at 32.1 ppbv

^c Field blank reported 1-ethyl-4-methylbenzene at 161 ppbv

^d Ethanol spike recovery was 2 – 4 percent

^e Isopropyl alcohol relative standard deviation (RSD) was 56.3 percent

^f Hexane RSD was 40.7 percent

^g m/p-Xylene spike recovery was 230 percent

4.1.2.2 Non-methane Organic Compounds (NMOCs)

Non-methane organic compounds (NMOCs) in the raw LFG were analyzed by Triangle Environmental Services in accordance with Method 25C, performed on the samples collected with Method 40. Table 4-2 presents the NMOC concentrations in the LFG.

This table also includes concentrations of CH₄, CO₂, and O₂, which were obtained by Method 3C. The analytes, oxygen (O₂), carbon dioxide (CO₂), and moisture, are not pollutants but are of interest as they are useful indicators of the “quality” of the raw LFG. The concentrations of nitrogen (N₂) and O₂ are also indicators of the extent of ambient air infiltration into the LFG collection. Method 25C for NMOC determination specifically recommends that these measurements be made to determine potential air infiltration. Therefore, while measurements for methane (CH₄), CO₂, O₂, and N₂ by Method 3C were not included in the original QAPP, these measurements were included and performed.

Table 4-2. Raw LFG Non-Methane Organic Compound (NMOC)

	NMOC (ppmv as Hexane)	CH ₄ (% v/v)		CO ₂ (% v/v)		O ₂ (%v/v)	N ₂ (% v/v)	Moisture (% v/v)
	Method 25C ^a	Method 25C ^a	Method 3C	Method 25C ^a	Method 3C	Method 3C	Method 3C	Method 23
Run 1	288	50.9	51.7	36.3	31.9	2.1	11.9	NM
Run 2	218	46.7	46.8	33.3	30.2	3.4	16.4	NM
Run 3	194	50.8	49.9	36.3	31.9	2.2	12.4	NM
Average	233	49.5	49.5	35.3	31.3	2.6	13.6	NM

NM – not measured because Method 23 sampling train was not run. Data column is included to retain format consistency with other reports.

Concentrations are reported without correction for nitrogen.

^a Method 25C samples hold time were up to 42 days. Method specifies 30 days hold time.

Non-methane organic compounds ranged from 194 to 288 ppmv as hexane. The major components in the LFG consisted of methane at an average concentration of 49.5 percent. Carbon dioxide ranged from approximately 30 to 36 percent. Oxygen was present at about 2 to 6 percent. Nitrogen concentrations averaged at 13.6 percent.

4.1.2.3 Hydrogen Sulfide (H₂S)

Raw LFG H₂S concentrations were obtained by collecting and analyzing the samples in accordance with EPA Method 11. The laboratory analysis reports and the concentration calculation worksheet are included in Appendix G. Table 4-3 presents the concentrations of H₂S in the raw LFG.

Table 4-3. Raw LFG Hydrogen Sulfide Concentrations

	H ₂ S Concentration	
	(mg/m ³)	(ppmv)
Run 1	519 J	366 J
Run 2	438 J	309 J
Run 3	413 J	291 J
Average	458 J	322 J

J – Estimated per EPA QA/G-8 guidance. Spike sample was not prepared. Spike recovery data were not available.

4.1.2.4 Carbonyls

The target carbonyl compounds, formaldehyde and acetaldehyde, were analyzed by SW-846 Method 8315 on samples collected by EPA Method 0100. The analysis reports, prepared by Resolution Analytics, are included as Appendix D. Calculation worksheets to convert the laboratory results to carbonyl concentrations in the raw LFG are presented as well. Table 4-4 below presents the concentrations of formaldehyde and acetaldehyde in the raw LFG.

Table 4-4. Raw LFG Carbonyls Concentrations

	Formaldehyde		Acetaldehyde	
	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)	($\mu\text{g}/\text{m}^3$)	($\times 10^{-3}$ ppmv)
MDL	2.9	2.3	3.8	2.1
Run 1	11.8	9.6	27.9	15.3
Run 2	8.9	7.2	151	82.8
Run 3	8.1	6.5	98.1	53.8
Average	9.6	7.8	92.4	50.6

4.1.2.5 Mercury (Hg)

Mercury (Hg) can exist in several forms. This test program focused on measuring the concentrations of the elemental, monomethyl, and dimethyl forms of Hg and the total Hg concentrations in the raw LFG. Total Hg, monomethyl Hg and dimethyl Hg were sampled and analyzed using the organic mercury method. Elemental Hg was measured with the LUMEX instrument.

Result tables that have data from both Frontier and Geochimica laboratories for the same run signifies that the samples were collected simultaneously by these two groups.

4.1.2.5.1 Total Mercury (Hg)

To collect the total Hg samples, an iodated charcoal trap was used as a sorbent. A backup tube was also present to assess any breakthrough. The sorbent tube was heated to above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor from the stream. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter with 10 ml resolution was used to quantify the volume of gas sampled.

Duplicate samples were collected simultaneously. One set was sent to Frontier Geosciences and the second set was sent to Studio Geochimica. The two laboratories performed the analysis independently. Their results provide a means of assessing the precision of the analytical method. Frontier Geosciences' results are included as Appendix E-1 and Studio Geochimica's results are included as Appendix E-2.

Table 4-5 presents the total Hg concentrations in the raw LFG. Total Hg concentrations ranged from 1330 to 1650 ng/m³. The average of all six measurements is 1460 ng/m³. The deviation from the overall mean of the six measurements ranged from 0.05 percent to 12.5 percent of the mean value.

Table 4-5. Raw LFG Total Mercury Concentrations

	Total Mercury Concentration			
	(ng/m ³)		(x10 ⁻⁶ ppmv)	
	Frontier ^a	Geochimica	Frontier ^a	Geochimica
MDL	50	9	6	1
Run 1	1460	1400	164	156
Run 2	1330	1410	149	158
Run 3	1520	NR	170	NR
Run 4	NR	1650	NR	184
Average	1430	1490	161	166

NR – No sampling while the other laboratory group was collecting sample.

^a Sample hold times were 30 days. Specified hold time was 14 days.

4.1.2.5.2 Dimethyl Mercury (Hg) Samples:

A Carbotrap was used as sorbent to collect samples for dimethyl Hg analysis. A backup trap was present to detect and assess breakthrough, if any. A third iodated carbon trap was present to collect elemental Hg if any is present. The sorbent tube was heated and maintained at temperatures above the dew point of the gas stream to prevent condensation on the sorbent. A silica gel impinger was used to collect and quantify the water vapor in the sampled gas. A diaphragm air pump was used to pull sample through the sampling train. A dry gas meter with 10 ml resolution was used to quantify the volume of gas sampled.

As in the measurement for total Hg, duplicate samples were collected simultaneously. One set was sent to Frontier Geosciences and the second set was sent to Studio

Geochemica. The two laboratories performed the analysis independently. Their results provide a means of assessing the precision of the analytical method. Frontier Geosciences' report of their results is included as Appendix E-1 and Studio Geochemica's report of their results is included as Appendix E-2.

Table 4-6 presents the dimethyl Hg concentrations in the raw LFG. Dimethyl Hg concentrations ranged from 17.4 to 99.8 ng/m³. The average of the six measurements was 52.5 ng/m³. Spike recoveries for the dimethyl Hg traps averaged at 98.3 percent.

Table 4-6. Raw LFG Dimethyl Mercury Concentrations

	Dimethyl Mercury Concentration			
	(ng/m ³)		(x10 ⁻⁶ ppmv)	
	Frontier	Geochemica	Frontier	Geochemica
MDL	0.5	0.4	0.05	0.04
Run 1	NR	17.4	NR	1.82
Run 2	73.6	NR	7.71	NR
Run 3	27.1	33.4	2.84	3.50
Run 4	63.8	99.8	6.68	10.5
Average	54.8	50.2	5.74	5.26

NR – No sampling while the other laboratory group was collecting sample.

4.1.2.5.3 Monomethyl Mercury (Hg) Samples

A sampling train, consisting of three impingers each filled with 0.001 M HCl, was used to collect samples for monomethyl Hg analysis. An empty fourth impinger was used to knockout any impinger solution and prevent carryover to the pump and metering system. A diaphragm air pump was used to pull sample through the train and collect the sample. A dry gas meter with 10 ml resolution was used to the volume of gas sampled.

As in the measurement for total Hg and dimethyl Hg, duplicate samples were collected simultaneously. One set was sent to Frontier Geosciences and the second set was sent to Studio Geochemica. The two laboratories performed the analysis independently. Their results provide a means of assessing the precision of the analytical method. Frontier Geosciences' results are included as Appendix E-1 and Studio Geochemica's results are included as Appendix E-2.

As shown in Table 4-7, monomethyl Hg concentrations in the raw LFG ranged from 3.4 to 8.2 ng/m³ with an mean of the six measurements of 5.4 ng/m³. Spike recovery for the monomethyl Hg sample was 89.7 percent.

Table 4-7. Raw LFG Monomethyl Mercury Concentrations

	Monomethyl Mercury Concentration			
	(ng/m ³)		(x10 ⁻⁶ ppmv)	
	Frontier	Geochimica	Frontier	Geochimica
MDL	0.13	1.4	0.014	0.15
Run 1	3.4	6.2	0.38	0.69
Run 2	4.6	4.6	0.52	0.52
Run 3	5.6	8.2	0.63	0.92
Average	4.5	6.3	0.50	0.71

4.1.2.5.4 Elemental Mercury (Hg)

Elemental Hg was determined by the LUMEX instrument. The measurement records are included as Appendix F and the results are presented in Table 4-8.

The LFG sample was collected from a pressurized port downstream of the compressor, as the LUMEX instrument was unable to draw a sample from the vacuum portion of the LFG header pipe.

Table 4-8. Raw LFG Elemental Mercury Concentrations

	Elemental Mercury Concentration ^a			
	Background		Raw LFG	
	(ng/m ³)	(x10 ⁻⁶ ppmv)	(ng/m ³)	(x10 ⁻⁶ ppmv)
Run 1	13	1.6	437	52.6
Run 2	9	1.1	445	53.6
Run 3	33	4.0	438	52.7
Average	18	2.2	440	53.0

^a Reported value is the average of three readings, each about 60-second in duration

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4.2 Boiler Stack Results

During the tests, the boiler ran under nominally unchanged conditions. The boiler operating conditions are shown in Tables 4-9a and 4-9b for a 2-day test period. The reported data were recorded from the boiler process control system monitor.

Table 4-9a. Boiler Operating Condition on June 22, 2005 as indicated by Boiler Control System

Time	Steam Production Rate (lb/hr)	LFG Flow Rate (scfm)	Stack O ₂ (% v/v)	Stack Temperature (°F)	% Load	Total Cumulative Heat Content (MMBtu)
06/22/05						
12:14	76,800	2,433	6.88	492	41.0	Not recorded ^a
12:52	75,609	2,348	7.27	489	41.0	Not recorded ^a
13:25	75,375	2,344	7.29	489	41.0	34,096
13:58	75,554	2,331	7.26	489	41.0	34,133
14:38	75,211	2,340	7.28	489	41.0	34,182
15:12	74,881	2,342	7.30	489	41.0	34,225
15:45	76,510	2,384	7.11	490	41.0	34,267
17:20	80,313	2,514	6.59	494	41.0	34,393
17:52	79,516	2,494	6.61	494	41.0	34,435
18:42	79,557	2,498	6.70	494	41.0	34,502
19:23	80,512	2,500	6.75	494	41.0	34,556
19:46	81,034	2,500	6.76	494	41.0	34,587

Event Notes:

11:41 Start M23 Run 1
 11:43 Start M23 Run 2
 15:55 Finished M23 Runs 1 and 2
 17:18 Start M29 Run 1 and M26A Run 1
 19:45 Finished M29 Run 1 and M26A Run 1

^a Reading was missed and not recorded during startup

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Table 4-9b. Boiler Operating Condition on June 23, 2005 as indicated by Boiler Control System

Time	Steam Production Rate (lb/hr)	LFG Flow Rate (scfm)	Stack O2 (% v/v)	Stack Temperature (°F)	% Load	Total Cumulative Heat Content (MMBtu)
6/23/05						
8:48	87,303	2,745	5.58	498	41.0	34,885
9:20	88,470	2,741	5.60	498	41.0	34,932
9:52	87,104	2,731	5.52	499	41.0	34,979
10:23	88,100	2,742	5.53	498	41.0	35,025
11:10	69,470	2,134	5.40	466	41.0	35,085
11:42	88,759	2,779	5.29	497	41.0	35,126
12:29	71,159	2,277	7.30	484	40.0	35,187
13:06	71,448	2,273	7.33	484	40.0	35,231
13:33	72,612	2,281	7.27	484	40.0	35,264
14:08	71,516	2,269	7.25	485	40.0	35,306
14:34	71,372	2,285	7.25	484	40.0	35,337
15:07	71,180	2,271	7.27	484	40.0	35,377
15:37	74,071	2,362	6.78	486	40.0	35,415
16:12	74,043	2,365	6.73	486	40.0	35,458

Event Notes:

- 8:47 Start M23 Run 3 and M26A Run 2
- 10:50 Finished M26A Run 2
- 11:00 Load dropped due to gas pressure problem. Will be back up to condition in 45 minutes.
- 11:27 Start M29 Run 2
- 12:05 Same pressure problem as at 11:00 will recover slowly.
- 12:56 Finished M23 Run 3
- 13:30 Finished M29 Run 2
- 14:06 Start M29 Run 3 and M26A Run 3
- 16:11 Finished M29 Run 3 and M26A Run 3

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The boiler stack was sampled for NMOCs (as THC_s), HCl, Pb, As, Cd, Cr, Mn, Ni, total Hg, PCDD/PCDFs, PAHs, SO₂, NO_x, CO, CO₂, and O₂. The stack cross section was divided into 24 equal areas according to EPA Method 1. Sampling run time for HCl and metals was 120 minutes. Run time for PCDD/PCDFs and PAHs was 240 minute. Run time for CEMS parameters (SO₂, NO_x, CO, O₂, CO₂, and THC_s) varied.

4.2.1 Boiler Stack Gas Flow Rate and Temperature

Samples from the boiler stack were collected under isokinetic conditions. As an integral part of the procedure, the sampling operation measured stack gas velocity distribution across the boiler stack and hence provided reliable measurements of stack gas flow rates. Table 4-10 lists the volumetric flow rates and temperatures at the boiler stack measured during the various sampling runs.

Table 4-10. Boiler Stack Gas Conditions Measured during Sampling

Run Number	Duration	Average Stack Temp (°F)	Carbon Dioxide (%)	Oxygen (%)	Moisture (%)	Velocity (actual ft/sec)	Vol. Flow Rate (acfm)	Vol. Flow Rate (dscfm)
E-Post-M26A-062205-01	06/22/05, 17:18 - 19:42	484	12.2	7.9	12.4	30.0	57,494	28,116
E-Post-M26A-062305-02	06/23/05, 08:47 - 10:50	488	12.2	7.2	14.1	31.3	59,925	28,629
E-Post-M26A-062305-03	06/23/05, 14:09 - 16:12	470	12.5	7.2	11.6	31.7	60,633	30,397
E-Post-M29-062205-01	06/22/05, 17:21 - 19:45	475	12.1	7.9	13.1	30.0	57,447	28,134
E-Post-M29-062305-02	06/23/05, 11:27 - 13:31	479	12.5	7.2	13.1	31.3	59,912	29,244
E-Post-M29-062305-03	06/23/05, 14:06 - 16:19	476	12.5	7.2	13.1	32.2	61,660	30,192
E-Post-M23-062205-01	06/22/05, 11:41 - 16:02	479	12.1	7.9	11.8	30.3	58,017	28,710
E-Post-M23-062205-02	06/22/05, 11:43 - 15:58	481	12.1	7.9	11.9	29.6	56,725	27,986
E-Post-M23-062305-03	06/23/05, 08:52 - 12:56	476	12.5	7.2	12.7	28.5	54,488	26,819
	Average	479	12.3	7.5	12.6	30.5	58,478	28,692

Boiler stack cross-section flow area is 31.92 sq. ft.

4.2.2 Boiler Stack Oxygen and Carbon Dioxide

Oxygen (O₂) and CO₂ concentrations provide an overall indication of the combustion process. Figure 4-1 shows the O₂ and CO₂ concentrations measured by the CEMs during the two days of testing. Table 4-11 presents the run averages of O₂ and CO₂ concentrations.

Table 4-11. Boiler Stack Oxygen and Carbon Dioxide Concentrations

	O ₂ (% v)	CO ₂ (% v)
Run 1	8.2	11.8
Run 2	7.4	12.1
Run 3	7.2	12.9
Run 4	7.4	12.8
Average	7.5	12.3

4.2.3 Boiler Stack Total Hydrocarbon (THC)

With consideration focused on data relevant to AP-42, NMOC is the analyte of interest at the boiler stack. Measurement of hydrocarbon concentrations EPA Method 25A, which included NMOCs, showed that THC concentrations to be below 50 ppmv. These low concentrations rendered Method 25C, the method designed specifically for NMOC measurement, unsuitable to be applied at this sample location. Hence, Method 25A became the practical method of choice.

Method 25A used a CEM and produced measurements of concentration of all hydrocarbons that respond to flame ionization detector (FID) analysis. Real-time continuous instrument responses are shown in Figure 4-2. The time-averaged concentrations are presented in Table 4-12.

A conservative approach can be taken to assume all hydrocarbons to be NMOCs. However, this interpretation will bias the NMOC concentration results high. As shown by the measurements, the concentrations of THC were low throughout the tests. Hence, concentrations of NMOC were also low at the boiler stack.

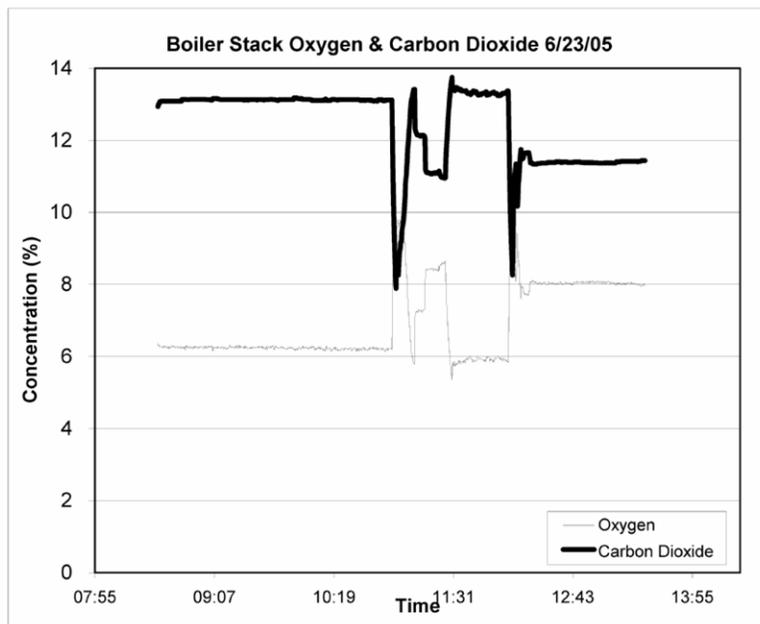
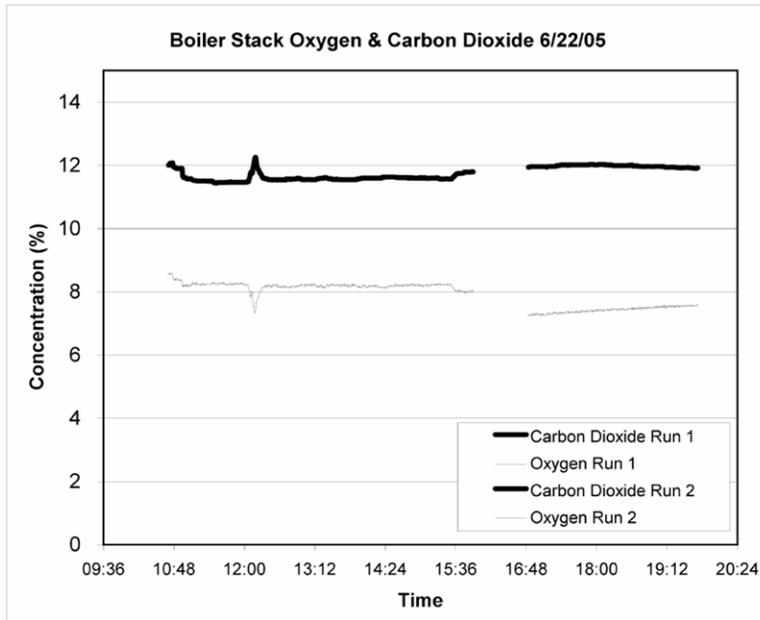


Figure 4-1. Boiler Stack Oxygen and Carbon Dioxide Concentrations

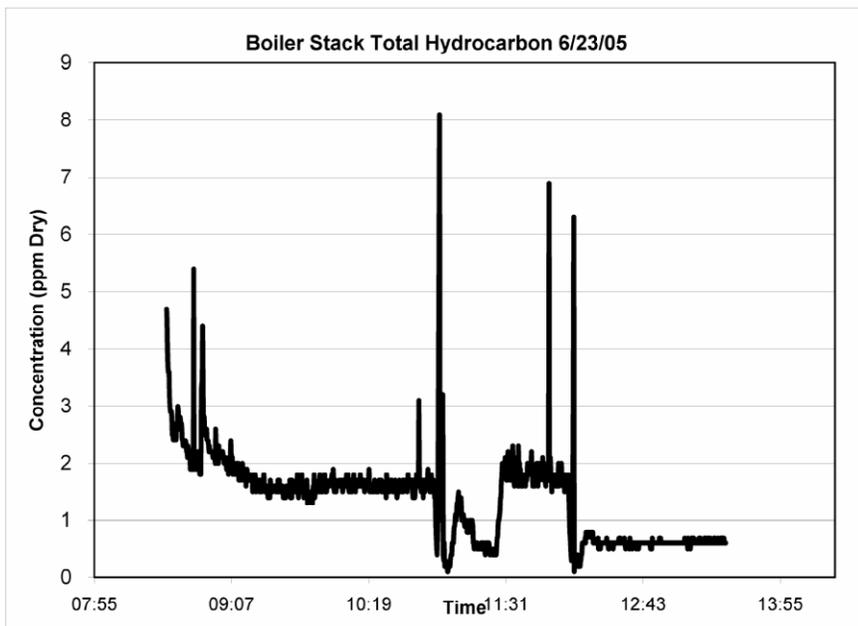
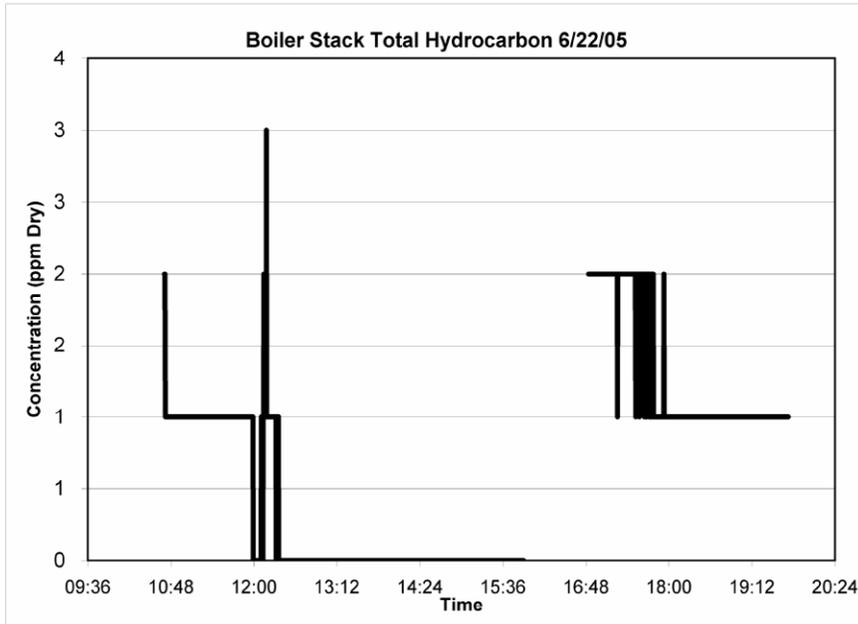


Figure 4-2. Boiler Stack Total Hydrocarbon Concentration

Table 4-12. Boiler Stack Total Hydrocarbon Concentration

	Total Hydrocarbon	
	(ppmdv as propane)	(ppmdv as hexane)
Run 1	ND	ND
Run 2	1	0.5
Run 3	1	0.5
Run 4	1	0.5
Average	1	0.4

4.2.4 Boiler Stack Dioxin/Furan (PCDD/PCDFs)

Three EPA Method 23 sampling runs were performed. Table 4-13 presents the boiler stack PCDD/PCDF emissions data. Table 4-14 presents the same data, but expressed in terms of Toxicity Equivalent emissions.

The data showed that detectable levels of PCDD/PCDFs were found in concentrations ranging from the single digit to several tens of picogram per standard cubic meter of the exhaust gas.

4.2.5 Boiler Stack Polycyclic Aromatic Hydrocarbon (PAH) Emissions

The concentrations of PAH were also obtained by Method 23. The results are presented in Table 4-15. The concentrations of PAHs in the boiler stack ranged from 10 ng/dscm of acenaphthylene to 1400 ng/dscm of fluoranthene.

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Table 4-13. Boiler Stack Dioxins and Furans

Analyte	E-062205-M23-1			E-062205-M23-2			E-062305-M23-3			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
<u>Dioxins</u>												
2,3,7,8-TCDD	1.1	54.4	120	1.3	62.9	139	<0.685	<31.2	<68.8	0.926	44.3	97.6
Other TCDD	78.1	3800	8400	71.1	3400	7500	77.4	3500	7800	75.5	3600	7900
1,2,3,7,8-PeCDD	<3.1	<152	<335	5.2	249	550	<2.3	<103	<228	2.6	126	277
Other PeCDD	82.1	4000	8800	89.5	4300	9400	58.2	2700	5800	76.6	3600	8000
1,2,3,4,7,8-HxCDD	3.3	162	356	4.2	200	441	2.5	114	252	3.3	159	350
1,2,3,6,7,8-HxCDD	6.0	291	642	7.6	360	794	5.1	230	508	6.2	294	648
1,2,3,7,8,9-HxCDD	4.2	207	456	5.7	271	598	3.5	159	351	4.5	212	468
Other HxCDD	71.8	3500	7700	82.5	3900	8700	59.0	2700	5900	71.1	3400	7400
1,2,3,4,6,7,8-HpCDD	27.7	1400	3000	31.9	1500	3300	24.3	1100	2400	28.0	1300	2900
Other HpCDD	27.6	1300	3000	34.0	1600	3600	23.7	1100	2400	28.5	1300	3000
1,2,3,4,6,7,8,9-OCDD	39.5	1900	4200	55.8	2700	5900	35.5	1600	3600	43.6	2100	4600
Total CDD	345	16800	37100	389	18500	40800	292	13300	29400	341	16200	35600
<u>Furans</u>												
2,3,7,8-TCDF	6.2	302	666	7.6	360	794	3.7	171	376	5.8	278	612
Other TCDF	198	9600	21200	215	10200	22600	114	5200	11500	176	8400	18400
1,2,3,7,8-PeCDF	9.4	457	1000	12.1	578	1300	6.0	271	598	9.2	435	960
2,3,4,7,8-PeCDF	13.0	635	1400	17.6	837	1800	7.9	359	791	12.8	610	1300
Other PeCDF	127	6200	13600	160	7600	16800	69.4	3200	7000	119	5700	12500
1,2,3,4,7,8-HxCDF	11.1	541	1200	16.7	796	1800	7.4	338	746	11.8	559	1200
1,2,3,6,7,8-HxCDF	11.7	569	1300	15.3	729	1600	7.8	356	785	11.6	551	1200
2,3,4,6,7,8-HxCDF	12.0	585	1300	15.8	750	1700	7.6	347	765	11.8	560	1200
1,2,3,7,8,9-HxCDF	2.8	139	307	4.5	216	476	1.9	89	196	3.1	148	326

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Analyte	E-062205-M23-1			E-062205-M23-2			E-062305-M23-3			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
Other HxCDF	57.8	2800	6200	84.4	4000	8800	36.0	1600	3600	59.4	2800	6200
1,2,3,4,6,7,8-HpCDF	28.3	1400	3000	38.9	1900	4100	21.7	987	2200	29.6	1400	3100
1,2,3,4,7,8,9-HpCDF	3.8	187	412	5.0	239	527	2.4	111	244	3.8	179	395
Other HpCDF	10.2	498	1100	15.5	738	1600	6.8	309	682	10.8	515	1100
1,2,3,4,6,7,8,9-OCDF	11.0	538	1200	12.9	615	1400	9.3	423	932	11.1	526	1200
Total CDF	304	24500	53900	407	29600	65200	188	13800	30400	300	22600	49900
Total CDD/CDF	648	41300	91000	796	48100	106000	480	27100	59800	640	38800	85500

“<” denotes the measurement was non-detect. The value following the “<” sign is the detection limit.

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Table 4-14. Boiler Stack Dioxins and Furans Toxicity Equivalent Emissions

Pollutant	Concentration	Emission Rate		1989 Toxicity Equivalency Factor	Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
<u>Dioxins</u>							
2,3,7,8-TCDD	0.926	44.3	97.6	1	0.926	44.3	97.6
Other TCDD	75.5	3600	7900	---	NA	NA	NA
1,2,3,7,8-PeCDD	2.6	126	277	0.5	1.3	63	139
Other PeCDD	76.6	3600	8000	---	NA	NA	NA
1,2,3,4,7,8-HxCDD	3.3	159	350	0.1	0.33	15.9	35
1,2,3,6,7,8-HxCDD	6.2	294	648	0.1	0.62	29.4	64.8
1,2,3,7,8,9-HxCDD	4.5	212	468	0.1	0.45	21.2	46.8
Other HxCDD	71.1	3400	7400	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDD	28.0	1300	2900	0.01	0.28	13.2	29
Other HpCDD	28.5	1300	3000	---	NA	NA	NA
1,2,3,4,6,7,8,9-OCDD	43.6	2100	4600	0.001	0.0436	2.1	4.6
Total CDD	341	16200	35600	---	4.0	189	417
<u>Furans</u>							
2,3,7,8-TCDF	5.8	278	612	0.1	0.58	27.8	61.2
Other TCDF	0.0084	8400	18400	---	NA	NA	NA
1,2,3,7,8-PeCDF	9.2	435	960	0.05	0.46	21.8	48.0
2,3,4,7,8-PeCDF	12.8	610	1300	0.5	6.4	305	673
Other PeCDF	119	5700	12500	---	NA	NA	NA

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Pollutant	Concentration	Emission Rate		1989 Toxicity Equivalency Factor	Concentration	Emission Rate	
	(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)		(x10 ⁻³ ng/dscm)	(x10 ⁻⁹ g/hr)	(x10 ⁻¹² lb/hr)
1,2,3,4,7,8-HxCDF	11.8	559	1230	0.1	1.2	55.9	123
1,2,3,6,7,8-HxCDF	11.6	551	1220	0.1	1.2	55.1	122
2,3,4,6,7,8-HxCDF	11.8	560	1240	0.1	1.2	56.0	124
1,2,3,7,8,9-HxCDF	3.1	148	326	0.1	0.31	14.8	32.6
Other HxCDF	59.4	2800	6200	---	NA	NA	NA
1,2,3,4,6,7,8-HpCDF	29.6	1400	3100	0.01	0.296	14.1	31.0
1,2,3,4,7,8,9-HpCDF	3.8	179	395	0.01	0.038	1.8	3.9
Other HpCDF	10.8	515	1100	---	NA	NA	NA
1,2,3,4,6,7,8,9-OCDF	11.1	526	1200	0.001	0.0111	0.526	1.2
Total CDF	300	22600	49900	---	11.6	553	1200
Total CDD/CDF	640	38800	85500	---	15.6	742	1600

NA – Not applicable because no Toxicity Equivalent Factor is available

“<” denotes the measurement was non-detect. The value following the “<” sign is the detection limit.

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Table 4-15. Boiler Stack Polycyclic Aromatic Hydrocarbons (PAHs) Emissions

Analyte	Formula Weight	E-062205-M23-1				E-062205-M23-2				E-062305-M23-3				Average			
		Concentration		Emission Rate		Concentration		Emission Rate		Concentration		Emission Rate		Concentration		Emission Rate	
		(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)	(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)	(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)	(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)
Acenaphthene	154.21	10.3	66.3	3200	7.1	10.2	65.6	3100	6.9	2.5	16.0	728	1.6	7.7	49.3	2400	5.2
Acenaphthylene	152.20	1.8	11.1	543	1.2	2.5	15.8	750	1.7	0.587	3.7	169	0.373	1.6	10.2	487	1.1
Anthracene	178.23	5.5	40.6	2000	4.4	6.7	50.0	2400	5.2	1.4	10.0	458	1.0	4.5	33.6	1600	3.5
Benzo(a)anthracene	228.30	41.9	398	19400	42.8	37.2	353	16800	37.0	16.3	154.	7000	15.5	31.8	302	14400	31.7
Benzo(a)pyrene	252.32	29.1	305	14900	32.8	36.3	380	18100	39.9	1.1	11.9	541	1.2	22.2	233	11200	24.6
Benzo(b)fluoranthene	252.32	81.0	850	41500	91.4	70.5	739	35100	77.5	36.9	387	17600	38.9	62.8	659	31400	69.3
Benzo(g,h,i)perylene	276.34	34.9	401	19500	43.1	28.3	325	15500	34.1	1.5	17.4	795	1.8	21.6	248	11900	26.3
Benzo(k)fluoranthene	252.32	30.5	320	15600	34.4	25.7	270	12800	28.3	12.5	132	6000	13.2	22.9	240	11500	25.3
Chrysene	228.29	69.2	657	32000	70.7	59.5	564	26800	59.2	33.0	313	14300	31.5	53.9	512	24400	53.8
Dibenzo(a,h)anthracene	278.35	7.3	84.4	41000	9.1	6.1	70.5	3400	7.4	3.0	34.9	1600	3.5	5.5	63.3	3000	6.7
Fluoranthene	202.26	213	1800	87300	192	190	1600	76100	168	84.1	707	32200	71.0	162	1400	65200	144
Fluorene	166.22	11.4	78.7	3800	8.5	12.1	83.4	4000	8.7	8.9	61.4	2800	6.2	10.8	74.5	3500	7.8
Indeno(1,2,3-cd)pyrene	288.35	33.4	401	19500	43.1	27.9	334	15900	35.0	8.0	95.7	4400	9.6	23.1	277	13300	29.2

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Analyte	Formula Weight	E-062205-M23-1				E-062205-M23-2				E-062305-M23-3				Average			
		Concentration		Emission Rate		Concentration		Emission Rate		Concentration		Emission Rate		Concentration		Emission Rate	
		(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)	(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)	(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)	(x10 ⁶ ppmv)	(ng/dscm)	(x10 ⁶ g/hr)	(x10 ⁶ lb/hr)
Naphthalene	128.17	183	974	47500	105	175	932	44300	97.7	84.1	448	20400	45.0	147	785	37400	82.5
Phenanthrene	178.23	174	1300	62800	139	242	1800	85300	188	74.3	550	25100	55.3	163	1200	57700	127
Pyrene	202.26	131	1100	53700	118	128	1100	51300	113	37.6	316	14400	31.7	99.0	832	39800	87.8
2-Methylnaphthalene	142.20	136	804	39200	86.5	170	1000	47800	106	23.5	139	6300	14.0	110	650	31100	68.6
Benzo(e)Pyrene	252.32	45.3	475	23200	51.1	39.5	414	19700	43.4	16.6	174	7900	17.5	33.8	355	16900	37.3
Perylene	253.31	3.6	37.7	1800	4.1	7.7	81.3	3900	8.5	0.176	1.8	84.1	0.186	3.8	40.3	1900	4.3

4.2.6 Hydrogen Chloride (HCl) Emissions

Boiler stack HCl emissions results are presented in Table 4-16. The concentrations were low, averaging at 1.4 ppmdv.

Table 4-16. Boiler Stack Hydrogen Chloride Measurement Results

	Concentration		Emission	
	(ppmdv)	($\times 10^3 \mu\text{g}/\text{m}^3$)	(lb/hr)	(g/hr)
Run 1	1.6	2.4	0.26	120
Run 2	1.3	2.0	0.21	95
Run 3	1.3	2.0	0.22	99
Average	1.4	2.1	0.23	100

4.2.7 Metals Emissions

Concentrations Toxic heavy metals in the engine stack gases were measured by Method 29. Manganese was determined by inductively coupled plasma – mass spectroscopy (ICP-MS). Arsenic (As), Cd, Cr, Pb, and Ni were determined by graphite furnace atomic absorption spectroscopy (GFAAS). Mercury was determined by cold vapor (CV) AA and was not detected in any of the samples. Boiler stack metals emissions results are presented in Table 4-17.

Mercury (Hg) concentration (elemental) was separately measured by the LUMEX instrument and those results are also included in Table 4-17.

4.2.8 Gaseous Emissions: Carbon Monoxide (CO), Sulfur Dioxide (SO₂), and Nitrogen Oxides (NO_x)

Gaseous emissions measured with CEMs include CO, SO₂ and NO_x. These results are in Table 4-18. Figures 4-3 through 4-5 show the real-time concentrations of CO, SO₂, and NO_x, respectively.

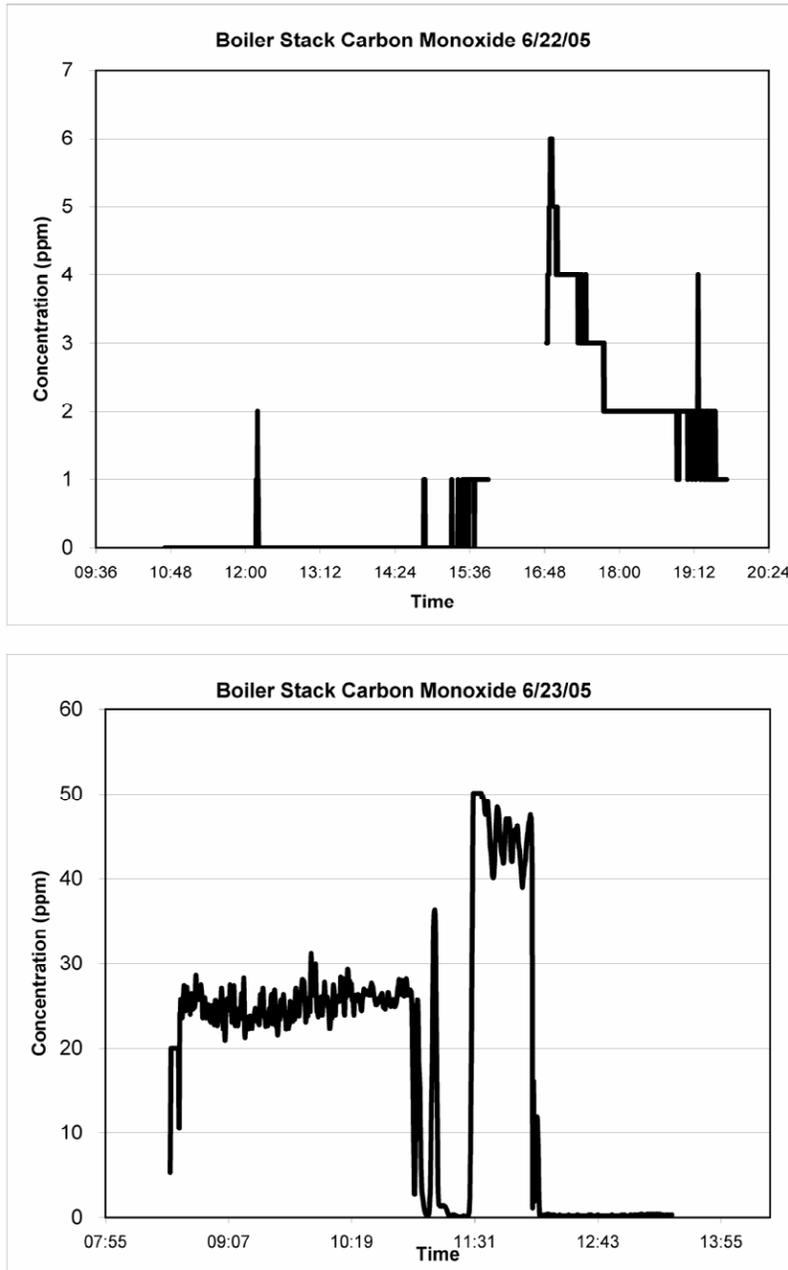


Figure 4-3. Boiler Stack Carbon Monoxide Concentration

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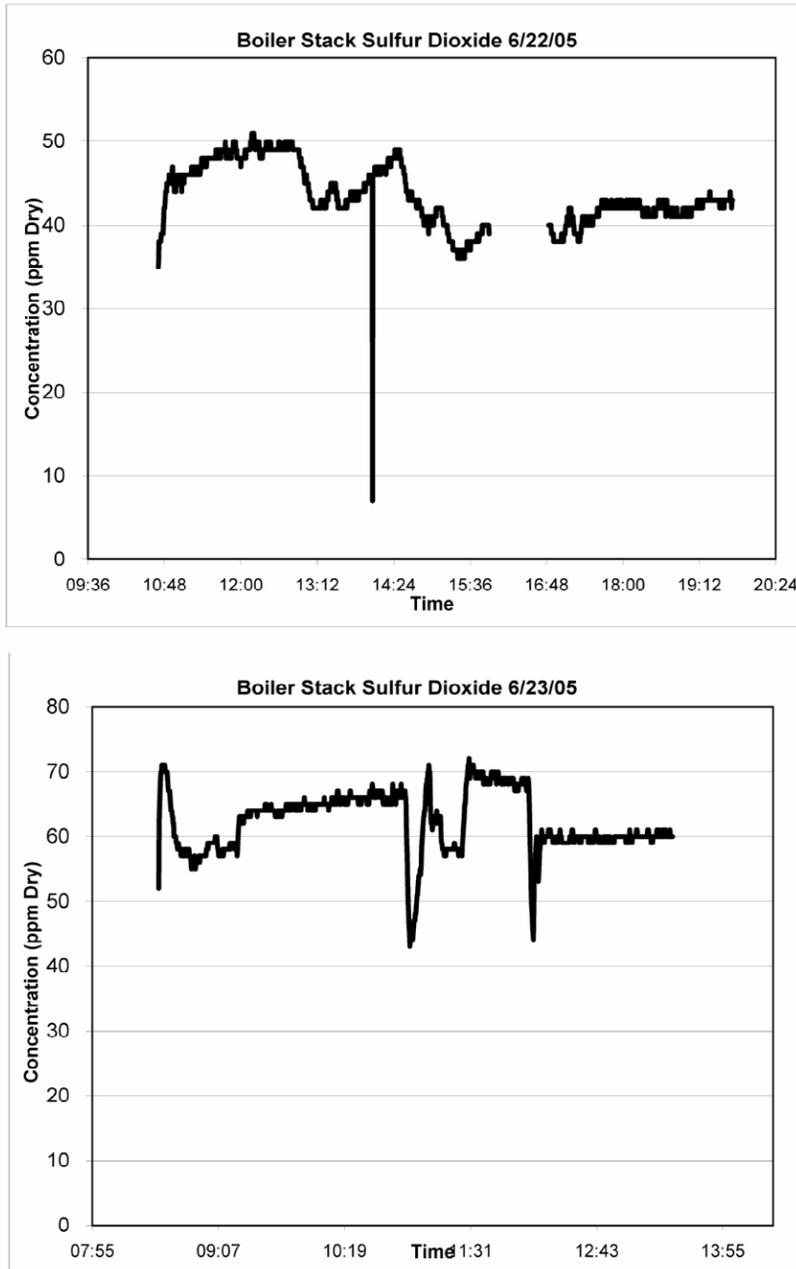


Figure 4-4. Boiler Stack Sulfur Dioxide Concentration

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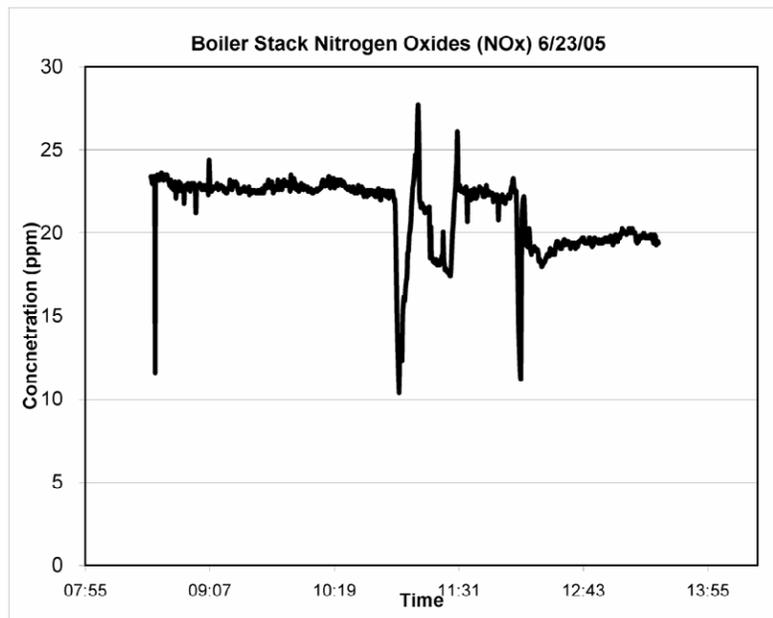
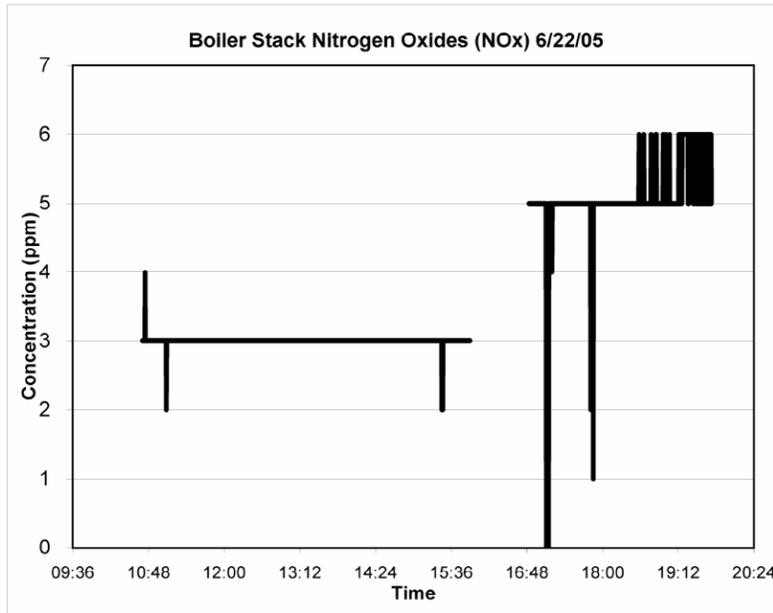


Figure 4-5. Boiler Stack Nitrogen Oxides Concentration

Table 4-17. Boiler Stack Metals Emissions

Analyte	E-062205-M29-1			E-062305-M29-2			E-062305-M29-3			Average		
	Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate		Concentration	Emission Rate	
	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)	(µg/dscm)	(x10 ⁻³ g/hr)	(x10 ⁻⁶ lb/hr)
Arsenic	1.8	87	190	2.6	130	260	2.4	120	240	2.3	110	221
Cadmium	1.1	52	120	1.5	74	160	1.1	57	130	1.2	61	135
Chromium	3.0	140	320	4.3	210	470	24	1200	2700	10	530	1200
Lead	7.2	340	760	4.2	210	460	6.4	330	730	6.0	300	649
Manganese	4.4	210	460	3.6	180	390	4.1	210	460	4.0	200	439
Nickel	5.3	250	560	10.9	540	1200	120	6400	14100	47	2400	5300
Mercury (Total by Method 29)	0.46	22	49	0.46	23	51	ND	ND	ND	0.46	23	50
	RUN 1			RUN 2			RUN 3			Average		
Mercury (Elemental by LUMEX)	.057	2.7	6.0	0.033	1.6	3.6	0.042	2.1	4.7	0.044	2.2	4.8

Table 4-18. Boiler Stack CO, SO₂, NO_x Concentrations

	Concentration (ppmdv)		
	CO	SO ₂	NO _x (as NO)
Run 1	0	45	3
Run 2	2	41	5
Run 3	18	66	21
Run 4	14	68	21
Average	9	55	13

4.3 Comparison with AP-42 Default Values

One of the major objectives of the test program is to expand on the database of LFG constituent compounds and their concentrations. If warranted, these data may contribute towards updating the AP-42 default values. Table 4-19 presents the concentrations of LFG constituents to provide direct comparisons with AP-42 default values. Table 4-20 presents the concentration of other constituents targeted by the various analyses but not listed in AP-42. An expanded discussion and comparison is included in the overall project summary report.

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Table 4-19. Comparison of Raw Landfill Gas Constituent Concentrations with AP-42 Default Values

Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1,1,1-Trichloroethane	71-55-6	133.42	0.48	0.0003	ND	ND	ND	ND	ND
M-40	1,1,2,2-Tetrachloroethane	79-34-5	167.85	1.11	0.0002	ND	ND	ND	ND	ND
M-40	1,1-Dichloroethane (Ethylidene Dichloride)	75-34-3	98.96	2.35	0.0003	ND	ND	ND	ND	ND
M-40	1,1-Dichloroethene	75-35-4	96.94	0.20	0.0002	ND	ND	ND	ND	ND
M-40	1,2-Dichloroethane	107-06-2	98.96	0.41	0.0003	ND	ND	ND	ND	ND
M-40	1,2-Dichloropropane	78-87-5	112.98	0.18	0.0003	ND	ND	ND	ND	ND
M-40	Isopropyl alcohol (2-Propanol)	67-63-0	60.11	50.10	0.0002	2.36	367	5870	43300	95.5
M-40	Acetone	67-64-1	58.08	7.01	0.0003	15.5	2300	37300	275000	606
M-40	Acrylonitrile	107-13-1	53.06	6.33	0.02	ND	ND	ND	ND	ND
M-40	Bromodichloromethane	75-27-4	163.83	3.13	0.0002	ND	ND	ND	ND	ND
M-40	Butane	106-97-8	58.12	5.03	1	2.53	380	6090	44900	99.0
M-40	Carbon Disulfide	75-15-0	76.13	0.58	0.0002	0.34	66.9	1070	7900	17.4
No Test	Carbon Monoxide	630-08-0	28.01	141	NM	NM	NM	NM	NM	NM
M-40	Carbon Tetrachloride	56-23-5	153.84	0.004	0.0005	ND	ND	ND	ND	ND
No Test	Carbonyl Sulfide (Carbon oxysulfide)	463-58-1	60.07	0.49	NM	NM	NM	NM	NM	NM
M-40	Chlorobenzene	108-90-7	112.56	0.25	0.0002	0.135	39.3	629	4640	10.2
M-40	Chlorodifluoromethane (Freon 22)	75-45-6	86.47	1.30	0.02	ND	ND	ND	ND	ND
M-40	Chloroethane (Ethyl Chloride)	75-00-3	64.52	1.25	0.0002	ND	ND	ND	ND	ND
M-40	Chloroform	67-66-3	119.39	0.03	0.0003	ND	ND	ND	ND	ND
M-40	Chloromethane	74-87-3	50.49	1.21	0.0001	ND	ND	ND	ND	ND
M-40	1,4-Dichlorobenzene	106-46-7	147.00	0.21	0.0003	ND	ND	ND	ND	ND

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	1,3-Dichlorobenzene	541-73-1	147.00	0.21	0.0002	ND	ND	ND	ND	ND
M-40	1,2-Dichlorobenzene	95-50-1	147.01	0.21	0.0003	ND	ND	ND	ND	ND
M-40	Dichlorodifluoromethane (Freon 12)	75-71-8	120.91	15.70	NM	NM	NM	NM	NM	NM
M-40	Dichlorofluoromethane (Freon 12)	75-43-4	102.92	2.62	0.0003	0.232	61.7	989	7290	16.1
M-40	Methylene Chloride (Dichloromethane)	75-09-2	84.94	14.30	0.0001	3.05	670	10700	79100	174
No Test	Dimethyl Sulfide (Methyl sulfide)	75-18-3	62.13	7.82	NM	NM	NM	NM	NM	NM
M-40	Ethane	74-84-0	30.07	889	1	13.5	1000	16800	124000	273
M-40	Ethanol	64-17-5	46.08	27.20	0.0002	ND	ND	ND	ND	ND
No Test	Ethyl Mercaptan (Ethanediol)	75-08-1	62.13	2.28	NM	NM	NM	NM	NM	NM
M-40	Ethylbenzene	100-41-4	106.16	4.61	0.0003	15.5	4300	68100	502000	1100
M-40	1,2-Dibromoethane (Ethylene dibromide)	106-93-4	187.88	0.001	0.0002	ND	ND	ND	ND	ND
M-40	Trichloromonofluoromethane (Fluorotrichloromethane) (F11)	75-69-4	137.38	0.76	0.0002	0.00820	2.9	47	344	0.758
M-40	Hexane	110-54-3	86.18	6.57	0.0003	0.597	133	2130	15700	34.6
M-11	Hydrogen Sulfide	7783-06-4	34.08	35.50	NR	322	28400	454000	3350000	7400
Organic mercury	Mercury (Dimethyl)		230.66	Not Listed	0.05E-06	5.5E-06	0.0033	0.0526	0.388	0.000856
LUMEX	Mercury (Elemental)	7439-97-6	200.61	Not Listed	NR	53.E-06	0.0275	0.440	3.25	0.0072
Organic mercury	Mercury (Monomethyl)		215.62	Not Listed	0.014E-06	0.61E-06	0.0003400	0.00545	0.0402	0.0000885
Organic mercury	Mercury (Total)		215.63	253.0E-6	6E-06	163.E-06	0.0909	1.46	10.7	0.0000237

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Method	Compound	CAS Number	Formula Wt.	Default Value (ppmv)	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
							(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-40	2-Butanone (Methyl Ethyl Ketone)	78-93-3	72.10	7.09	0.0003	2.49	464	7430	54800	121
M-40	2-Hexanone (Methyl Butyl Ketone)	591-78-6	100.16	1.87	0.0002	ND	ND	ND	ND	ND
No Test	Methyl Mercaptan (Methanethiol)	74-93-1	48.11	2.49	NM	NM	NM	NM	NM	NM
M-40	Pentane	109-66-0	72.15	3.29	1	1.30	242	3880	28600	63.1
M-40	Tetrachloroethylene (Perchloroethylene)	127-18-4	165.83	3.73	0.0003	0.125	53.6	858	6330	14.0
M-40	Propane	74-98-6	44.09	11.10	1	13.0	1500	23700	175000	386
M-40	t-1,2-Dichloroethene	156-60-5	96.94	2.84	0.0003	ND	ND	ND	ND	ND
M-40	Trichloroethylene (Trichloroethene)	79-01-6	131.38	2.82	0.0002	0.0940	31.9	511	3770	8.3
M-40	Vinyl Chloride	75-01-4	62.50	7.34	0.0002	0.0634	10.2	164	1210	2.7
M-40	m/p-Xylene (Dimethyl Benzene)	1330-20-7	106.16	12.10	0.00065	9.00	2500	39600	292000	643
M-40	o-Xylene (Dimethyl Benzene)	95-47-6	106.16	12.10	0.0003	3.10	851	13600	100000	222
M-40	Benzene (Co-disposal)	71-43-2	78.11	11.10	0.0002	0.887	179	2870	21100	46.6
M-40	Benzene (No-disposal or Unknown)	71-43-2	78.11	1.91	0.0002	0.887	179	2870	21100	46.6
M-25C	NMOC as Hexane (Co-disposal)		86.17	2420.00	NR	233	51900	831000	6130000	13500
M-25C	NMOC as Hexane (No-codisposal or Unknown)			595.00	NR	233	51900	831000	6130000	13500
M-40	Toluene (Methyl Benzen) (Co-disposal)	108-88-3	92.13	165.00	0.0003	7.95	1900	30300	224000	493
M-40	Toluene (Methyl Benzene) (No or Unknown)			39.30	0.0003	7.95	1900	30300	224000	493

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Table 4-20. Raw Landfill Gas Constituent Concentrations for Compounds without AP-42 Default Values

Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						(x10 ⁻⁹ lb/ft ³)	(µg/m ³)	(mg/hr)	(x10 ⁻³ lb/hr)
M-0100	Acetaldehyde	75-07-0	44.05	0.021	0.0503	5.7	91.7	677	1.5
M-0100	Formaldehyde	50-00-0	30.03	0.016	0.00767	0.595	9.54	70.3	0.155
M-25C	Carbon Dioxide	124-38-9	44.01	NR	353000	40200000	643000000	4740000000	10500000
M-25C	Methane	74-82-8	16.04	NR	495000	20500000	329000000	2420000000	5300000
M-25C	Oxygen	7782-44-7	32.00	NR	25700	2100000	34100000	251000000	554000
M-40	1,1,2,3,4,4-Hexachloro-1,3-butadiene	87-68-3	260.76	0.0002	ND	ND	ND	ND	ND
M-40	1,1,2-Trichloro-1,2,2-trifluoroethane (CFC113)	76-13-1	187.38	0.0002	ND	ND	ND	ND	ND
M-40	1,1,2-Trichloroethane	79-00-5	133.42	0.0002	ND	ND	ND	ND	ND
M-40	1,2,4-Trichlorobenzene	120-82-1	181.46	0.0003	ND	ND	ND	ND	ND
M-40	1,2,4-Trimethylbenzene	95-63-6	120.19	0.0003	2.64	820	13100	96900	214
M-40	1,2-Chloro-,1,2,2-Tetrafluoroethane (CFC114)	76-14-2	170.92	0.0002	0.0153	6.8	108	799	1.8
M-40	1,3,5-Trimethylbenzene	108-67-8	120.19	0.0002	1.04	323	5180	38200	84.1
M-40	1,3-Butadiene (Vinylethylene)	106-99-0	54.09	0.0003	ND	ND	ND	ND	ND
M-40	1,4-Dioxane (1,4-Diethylene Dioxide)	123-91-1	88.10	0.0002	ND	ND	ND	ND	ND
M-40	1-Ethyl-4-methylbenzene (4-Ethyl Toluene)	622-96-8	120.20	0.0002	2.51	780	12500	92100	203
M-40	4-Methyl-2-pentanone (MIBK)	108-10-1	100.16	0.0002	ND	ND	ND	ND	ND
M-40	Benzyl Chloride (Chloromethyl Benzene)	100-44-7	126.58	0.0002	ND	ND	ND	ND	ND
M-40	Bromomethane (Methyl bromide)	74-83-9	94.95	0.0002	ND	ND	ND	ND	ND
M-40	cis-1,2-Dichloroethene	156-59-2	96.94	0.0003	0.163	40.8	654	4820	10.6
M-40	cis-1,3-Dichloropropene	10061-01-5	110.98	0.0002	ND	ND	ND	ND	ND
M-40	Cyclohexane	110-82-7	84.16	0.0003	ND	ND	ND	ND	ND

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Method	Compound	CAS Number	Formula Wt.	Detection Limit (ppmv)	Measured Average (ppmv)	Concentration in Inlet LFG		Mass Flow Rate in Inlet LFG Stream	
						($\times 10^{-9}$ lb/ft ³)	($\mu\text{g}/\text{m}^3$)	(mg/hr)	($\times 10^{-3}$ lb/hr)
M-40	Dibromochloromethane	124-48-1	208.29	0.0002	ND	ND	ND	ND	ND
M-40	Ethyl Acetate	141-78-6	88.10	0.0003	ND	ND	ND	ND	ND
M-40	Heptane	142-82-5	100.20	0.0002	0.331	85.7	1370	10100	22.3
M-40	Methyl-t-butyl Ether (MTBE)	1634-04-4	88.15	0.0003	ND	ND	ND	ND	ND
M-40	Styrene (Vinylbenzene)	100-42-5	104.14	0.0001	0.420	113	1810	13400	29.4
M-40	t-1,3-Dichloropropene	1006-02-6	110.98	0.0002	ND	ND	ND	ND	ND
M-40	Tetrahydrofuran (Diethylene Oxide)	109-99-9	72.10	0.0004	0.871	162	2600	19200	42.3
M-40	Tribromomethane (Bromoform)	75-25-2	252.77	0.0003	ND	ND	ND	ND	ND
M-40	Vinyl Acetate	108-05-4	86.09	0.0005	0.111	24.7	396	2920	6.4

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5. Quality Assurance/Quality Control

This project produced data that qualified to receive the “A” rating with respect to the rating system described in section 4.4.2 of the *Procedures for preparing Emission Factor Documents* (EPA-454/R-95-015). The cited EPA document provides a clear description of the requirements for an “A” data quality rating. Tests were performed by using an EPA reference test method, or when not applicable, a sound methodology. Tests were reported in enough detail for adequate validation and raw data were provided that could be used to duplicate the emission results presented in this report.

Throughout the results sections of this report, notations and footnotes were included to flag data that, for various reasons, did not meet their associated measurement quality objectives.

5.1 Assessment of Measurement Quality Objectives

Measurement quality objectives (MQOs) were established for each critical measurement and documented in the *Site-Specific QAPP for the Field Evaluation of Landfill Gas Control Technologies-Landfill E*. The following subsections assess MQOs for each measurement to determine if goals were achieved. When applicable, data validation elements performed on laboratory analytical reports are also included.

5.1.1 Continuous Emissions Monitors (CEMs)

Combustion produce gases O₂, CO/CO₂, SO₂, NO_x and THC were measured in the field using CEMs. The following MQOs were established for CEM measurements for Landfill E:

- Direct calibration bias: ± 2 percent
- System bias checks: ± 5 percent
- Zero and drift: ± 3 percent
- Completeness: >90 percent

Direct calibrations were performed daily, prior to testing, with certified calibration gases at zero and a minimum of two other concentrations (typically a mid-level concentration and one point towards the full-scale end of the instrument range). System

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bias checks were performed pre-test and post-test. Drift checks were performed daily, post-test. Table 5-1 summarizes these quality control (QC) checks for all instruments. All MQOs were met for all CEM measurements

Table 5-1. CEM MQO Summary for Landfill E

Instrument and Range	Direct Calibration (±2% criteria)			System Bias Checks (±5% criteria)			Drift Checks (±3% criteria)		
	Total (#)	Bias Range (%)	Complete (%)	Total (#)	Bias Range (%)	Complete (%)	Total (#)	Bias Range (%)	Complete (%)
Servomex O ₂ Analyzer (0-21%)	8	0.1 – 0.3	100	8	0.3 – 1.0	100	8	0.05 – 1.0	100
Cal Analytical CO ₂ Analyzer (0-20%)	8	0.0 – 0.6	100	8	0.1 – 1.1	100	8	0.0 – 1.2	100
Cal Analytical CO Analyzer (0-650 ppm)	12	0.0 – 1.2	100	8	0.0 -2.0	100	8	0.0 – 1.4	100
Cal Analytical SO ₂ Analyzer (0-500 ppm)	8	0.0 – 1.4	100	8	0.0 – 2.2	100	8	0.0 – 2.2	100
TECO THC Analyzer (0-1000 ppm)	NA ^a	NA ^a	NA ^a	12	0.0 -0.4	100	8	0.0 – 1.0	100
TECO NO _x Analyzer (0-4000 ppm)	8	0.0 – 0.2	100	8	0.0 – 0.8	100	8	0.0 – 0.5	100

^a The method called for calibration gases to be introduced at a point of the sampling system close to the sampling probe for them to flow through the heated sample line. Calibration gases were not injected directly to the analyzer

5.1.2 Carbonyls (Method TO-11)

The following MQOs were established in the QAPP for this method:

- Recovery (formaldehyde): 50-150 percent
- Completeness: >90 percent

Four samples (including three raw LFG samples and one field blank) were submitted to Resolution Analytics for formaldehyde and acetaldehyde determination. Results were

reported in RFA# 90231. The report included information on instrument calibration and internal QC checks. Samples collected on June 22, 2005 were received by the laboratory on July 5, 2005 and analyzed on July 12, 2005. That met the 30-day hold-time limitation. Analytical detection limits were reported as 15.9 ppb for formaldehyde and 20.9 ppb for acetaldehyde in the liquid extract.

The extract value was 5 ml. Hence, the detection limit amounts were 79.5 ng and 104.5 ng, respectively. The sample gas volume was about 27 standard liters. Therefore, the gas phase MDL for formaldehyde and acetaldehyde were 2.3 ppbv and 2.1 ppbv, respectively.

The field blank did not have detectable levels of either compound. To assess accuracy, an external performance evaluation audit sample containing 2.0 ppm formaldehyde and acetaldehyde was analyzed with the sample set. Recovery was 95.2 percent for formaldehyde and 99.8 percent for acetaldehyde, which met the 50-150 percent MQO. All project samples were injected in duplicate and the percent drift (%D) range for formaldehyde was 3.1 to 22.8 percent and for acetaldehyde was 0.2 to 4.4 percent. All MQOs were met for this method for a completeness of 100 percent.

5.1.3 Hydrogen Sulfide (H₂S) (EPA Method 11)

The following MQOs were established in the Landfill E QAPP for this method:

- Accuracy: ± 5 percent bias
- Completeness: >90 percent

Four samples (including a reagent blank) plus two laboratory in-house reagent blanks were submitted to Enthalpy Analytical Inc. for H₂S analysis by EPA Method 11. The samples were collected on June 22, 2005, submitted to the laboratory on June 30, 2005, and the results report was dated July 15, 2005. Therefore the analysis met the 30-day hold time criteria.

The field blank submitted did not have quantifiable concentrations of H₂S. No field spike or laboratory spike was performed. While Method 11 does not require sample spike recovery in its procedure, the QAPP specified one spike sample to be analyzed. The three test samples produced results of similar concentrations. The analysis was 75 percent complete. The lack of demonstrated satisfactory spike recovery data warrants the data to be flagged as estimated and notated with a "J".

5.1.4 Dioxins and Furans (PCDD/PCDFs) (EPA Method 23/0011)

The following MQOs were established in the QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

Four sample sets (including one set of reagent blank and sample train rinsates) were submitted to ALTA Analytical Perspectives for PCDD/PCDFs analysis. The samples were collected on June 23, 2005, delivered to the laboratory on July 1, 2005, and analyzed on July 14, 2005. That met the 14-day hold-time for extraction and 40-day hold time for analysis.

The field blank did not have detectable levels of either compound. Detection limits for the various congeners were in the single-digit pictogram level. To assess accuracy, each sample train was spiked with standard Method 23 spiking compounds and analysis of the samples yielded extraction standard (ES) recovery from 77 to 90 percent. Recovery of sampling standards ranged from 96 to 103 percent. These recoveries are well within the 50-150 percent MQO. All MQOs were met for this method for a completeness of 100 percent.

5.1.5 Polycyclic Aromatic Hydrocarbons (PAHs) (EPA Method 23/0011)

The following MQOs were established in the QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

Four samples (including one reagent blank) were submitted to ALTA Analytical Perspectives for PAH analysis. The report included information on instrument calibration and internal QC checks. Samples collected on June 23, 2005 were received by the laboratory on July 1, 2005 and analyzed on July 15, 2005. That met the 14-day hold-time for extraction and 40-day hold time for analysis.

Table 5-2 shows the amounts of detectable target analytes in the reagent blank and the average amounts of the respective target analytes that were found in the test samples. The analysis yielded detectable but low levels of the target compounds, in the range of

less than 1 ng for acenaphthylene to 385 ng for naphthalene. In contrast, the test samples showed PAH levels that were significantly higher than those found in the reagent blank. Therefore, the presence of detectable analytes in the reagent blank did not change the conclusions that can be drawn from the test sample concentration measurements,

Recovery of ES ranged from 90 to 105 percent. Recovery of sampling standards (SS), d₁₀-fluorene was 109 percent, and 111 percent for d₁₄-terphenyl. Recovery of the alternative standard (AS) d₁₀-anthracene was 100 percent. These recoveries were well within the 50 to 150 percent MQO. Hence, all MQOs were met for this method for a completeness of 100 percent.

Table 5-2. Polycyclic Aromatic Hydrocarbon Reagent Blank Target Analyte Concentrations

Analyte	Amount found in RR062305 – Reagent Blank (ng)	Average Amount found in Test Samples (ng)
Naphthalene	385	2610
2-Methylnaphthalene	12.0	2170
Acenaphthylene	0.423	33.9
Acenaphthene	1.54	165
Fluorene	94.4	246
Phenanthrene	16.3	4010
Anthracene	2.06	112
Fluoranthene	15.1	4550
Pyrene	14.5	2780
Benzo(a)Anthracene	3.20	1000
Chrysene	4.54	1700
Benzo(b)Fluoranthene	6.80	2190
Benzo(k)Fluoranthene	2.37	800
Benzo(e)Pyrene	3.73	1180
Benzo(a)Pyrene	3.22	780
Perylene	0.396	134
Indeno(1,2,3-cd)Pyrene	3.27	926
Dibenzo(a,h)Anthracene	<4	211
Benzo(ghi)Perylene	3.43	835

5.1.6 Non-Methane Organic Compounds (NMOCs) (Method 25C)

The following MQOs were established in the QAPP for Landfill E:

- Recovery: 50 to 150 percent
- Completeness: >90 percent

Five canister samples (including a field blank) were submitted from Landfill E for NMOC analysis by Method 25-C to Triangle Environmental Services. The samples were collected on June 22, 2005, submitted on July 22, 2005, and analyzed July 27 – August 4, 2005. Therefore the analysis did not meet the 30 day hold time requirements. The apparent delay in sample delivery was partly attributed to the fact that the same canisters had to be analyzed by RTP Laboratory for volatile organics first. The impact of exceeding the prescribed 30-day hold time by up to 12 days is unknown.

The laboratory report included information on instrument calibration and internal QC checks.

The only NMOC detected in the field blank was at 3 ppmv as hexane. Accuracy for the method was assessed by evaluating results of response factor (RF) check samples that were run prior to and following sample analysis. Acceptance criteria established by the method is that the RF must be within 20 percent of the RF from initial calibration. All RF checks were within 10 percent of the initial calibration, well within the acceptance criteria. The %D between the pre and post-test checks were less than 2 percent. Samples were run in triplicate and all percent relative standard deviations (RSDs) for samples were less than 1.5 percent.

There was a problem with Sample #4 in that this sample contained nitrogen (N₂) and O₂ concentrations that exceeded the Method 25C criteria of 20 percent for N₂ and 5 percent for O₂. Therefore, the NMOC concentration value for Sample #4 could not be used. With data from three of the four samples being usable, and the QAPP specified that three test samples were to be analyzed, the completeness MQO for this measurement was 100 percent and met the objective set in the QAPP. The problem with Sample #4 notwithstanding, the data set was valid.

5.1.7 Hydrogen Chloride (HCl) (EPA Method 26A)

The following MQOs were established in the QAPP for Landfill E:

- Accuracy: ± 10 percent bias
- Completeness: >90 percent

Four samples (including one field blank) were submitted to Resolution Analytics for HCl and chlorine (Cl_2) determination. The results were reported in RFA# 990231. The report included information on instrument calibration and internal QC checks. Samples were collected on June 22, 2005, received by the laboratory on July 5, 2005, and analyzed on July 4, 2005, which met the 4 week hold-time requirement. Analytical detection limits were reported as 0.188 ppm for both HCl and Cl_2 .

The field blank did not contain detectable levels of HCl or Cl_2 . In-house audit samples were analyzed with each respective group of field samples and the measured concentrations fell within method criteria of 10 percent of their expected values.

A matrix spike was performed on Sample #3 (RR062305-3). A 0.75 ml of sample was spiked with 0.75 ml of standard (5 ppm HCl) and analyzed in duplicate. A 1.1 ml of sample was spiked with 0.5 ml of standard (20 ppm Cl_2) and analyzed in duplicate. The laboratory reported 98.7 percent recovery of the HCl spike with a 0.8 percent deviation in duplicate injections; and 96.9 percent recovery of the Cl_2 spike with a 0.91 percent deviation. This meets the MQO of ± 10 percent with very good precision. Calculated bias for internal QC check was less than 2.2 percent. All MQOs were met for 100 percent completeness.

5.1.8 Metals (EPA Method 29)

The following MQOs were established in the Landfill E QAPP for this method:

- Accuracy: ± 25 percent bias
- Completeness: >90 percent

Four sets of Method 29 Multi-Metals trains (including one field blank) were submitted to First Analytical Laboratories for As, Cd, Cr, Pb, Mn, Hg, and Ni determination.

Results were reported in Project #50627. The report included information on instrument calibration and internal QC checks. Samples were collected on June 22, 2005, received by the laboratory on June 28, 2005, and analyzed on July 5, 2005, which met the 14 day hold-time requirement. Method detection limits for each of the target metals were reported as follows:

- As = 7.0 µg/L
- Cd = 0.2 µg/L
- Cr = 5.0 µg/L
- Pb = 5.0 µg/L
- Mn = 10 µg/L
- Ni = 10 µg/L
- Hg = 0.2 µg/L

Traces of Cd, Cr, Mn and Ni were found in the blanks, which is not unusual. Some of the back half Mn samples were abnormally high. This is a common problem which can occur in Method 29 if a tiny amount of the potassium permanganate reagent gets in to the hydrogen peroxide impingers.

All samples were spiked prior to analysis. Spike recoveries ranged from 75 to 108 percent and were within the acceptable range of 75-125 percent. In addition to spiking the samples, for each metal, internal calibration verification samples (ICVs) and continuing calibration verification samples (CCVs) were performed. ICVs were run at the beginning of each run set and CCVs were run at a frequency of one for every ten samples. ICV and CCV measured values were all less than ±10 percent for all metals with the exception of Ni which had a CCV of +12.2 percent. This was not considered a major failure and data limitations were not applied. Therefore, the MQO for this measurement was 100 percent and met the objective set in the QAPP.

5.1.9 Organo-Mercury (Hg) and Total Mercury (Hg) (Frontier and Geochimica)

The following MQOs were established in the Landfill E QAPP for this method:

- Recovery: 50-150 percent
- Completeness: >90 percent

Mercury (Hg) analysis was performed separately by Frontier Geosciences and Studio Geochimica.

5.1.9.1 *Frontier Geosciences*

Four total Hg samples (including a field blank) were taken at Landfill E. Samples were collected on June 22, 2005 and analyzed on July 22, 2005. That analysis schedule exceeded the 14-day hold-time specified in the QAPP. All other quality assurance measures indicated that the analysis of the traps were under good control. All field blanks were consistent with historical values and indicated the detection limit was likely to be at or below the previous estimated value of 50 ng/m³. Spike recoveries were 106.5 to 108.1 percent and relative percent difference (RPD) between replicates was 4 percent, which meets MQOs and are 100 percent complete.

Five monomethyl mercury (MMHg) samples (including a field blank and a field spike) were collected on June 23, 2005. These samples were analyzed on July 14, 2005 which exceeded the 14-day hold-time. Analysis of these samples was under good control with acceptable distillation spike recoveries and distillation duplicates. All CCV standards had acceptable recoveries. Spike recovery was 101 percent, which meets MQOs. RSD between replicates was less than 10 percent. Monomethyl mercury (MMHg) analysis was 100 percent complete.

Seven dimethyl mercury (DMHg) samples (including a field blank and two trip spikes) were collected on June 22, 2005. These samples were analyzed on July 7 to 14, 2005 and did not meet the 14-day hold-time. The analysis of samples was well within control, with acceptable recoveries as well as good linear control standards and second-source standard recoveries. Spike recovery for these samples was 78 to 80 percent and RSD between replicate samples was 2.5 percent. This meets MQOs established in the QAPP and DMHg analysis was therefore 100 percent complete.

The field blank was low indicating that the trap media, handling procedures, and analytical techniques do not contribute to the reported values. Field matrix spike recoveries ranged from 67 to 93 percent. The DMHg analysis was 100 percent complete.

5.1.9.2 Studio Geochimica

Four total Hg samples (including a field blank) were taken at Landfill E. Samples were collected on June 22, 2005, received at the laboratory on July 1, 2005 and analyzed on July 2, 2005. This analysis schedule met the 14-day hold-time specified in the QAPP. All other quality assurance (QA) measures indicated that the analysis of the traps were under good control. All field blank concentrations were low and the detection limit is estimated at 10 ng/m³. Spike recovery was 100.2 and RPD between replicates was 0.7 percent. These analyses meet the MQOs and are 100 percent complete.

Five MMHg samples (including a field blank and a field spike) were collected on June 23, 2005. These samples were analyzed on July 2, 2005. The analysis met the 14-day hold-time requirement. Spike recovery was 98.7 percent, which met MQOs. The RSD between replicates was 2.2 percent. The MMHg analysis was 100 percent complete.

Five DMHg samples (including a field blank and a field spike) were collected on June 22, 2005. These samples were extracted and analyzed on July 2, 2005, which meets the 14-day hold-time requirement. Spike recovery was 89.6 percent and RSD. This meets MQOs the established in the QAPP and DMHg analysis is therefore 100 percent complete.

5.1.10 Volatile Organic Compounds (VOCs) and Methane (CH₄) (Method TO-15)

The following MQOs were established in the Landfill E QAPP for this method:

- Accuracy: 50-150 percent recovery
- Completeness: >90 percent

Five SUMMA canisters (including one field blank) were submitted from Landfill E to RTP Laboratories for VOC and CH₄ determination by EPA Method TO-15. Results were reported in Project #05-072. Samples were collected on June 22 and 23, 2005 and analysis was completed by July 13, 2005, which met the 30 day hold-time requirement.

Analysis of the field blank found 32.1 ppbv of heptane and 161 ppbv of 1-ethyl-4-methylbenzene. Other target analytes were not found at method detection levels (MDLs) in the range of 0.1 to 0.65 ppbv.

Accuracy was assessed using results of a 10 ppbv laboratory control sample containing all target compounds. For all but two compounds, recoveries ranged from 60-150 percent, which met the established acceptance criteria of 50-150 percent. The recovery reported for ethanol was 2.4 percent, and 230 percent for m/p-xylene. Results for these two compounds should be flagged as estimated, "J".

Sample 062205-04 was spiked with 200 ppbv of chlorobenzene prior to dilution with helium and analysis. The recovery of chlorobenzene was 89.5 percent.

Precision was demonstrated through multiple injections of standards at five concentration levels. The RSD between the calculated relative response factors (RRF) must be less than 30 percent with allowances that two may be greater than 40 percent. The average RSD was 13.8 percent and method criteria were met for all compounds except isopropyl alcohol with an RSD of 56.3 percent and hexane with an RSD of 40.7 percent. Results for these compounds should be flagged as estimated, "J". Valid data was received for all SUMMA canisters submitted; these analyses are considered to be 100 percent complete.

5.2 Audits

This project was designated as QA Category II effort. Hence, audits were required. The internal and external audits performed for this project were completed earlier and their findings were included in the Landfill D report of this project.

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